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October 13, 2005

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Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Federal Communications Commission
Office of Secretary

Re: APPLICATION OF ALLTEL COMMUNICATIONS, INC. FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE STATE OF GEORGIA — CONFIDENTIAL TREAMENT REQUESTED

Dear Ms. Dortch:

Alltel Communications, Inc. ("Alltel"), by its attorneys, hereby submits an original and four redacted copies of Alltel's Application for Designation as an Eligible Telecommunications Carrier in the State of Georgia ("Application"). Alltel is simultaneously submitting a confidential copy of this filing. As such, Alltel requests confidential treatment under Section 0.459 of the Commission's rules regarding Exhibit D (Alltel's Five-Year Service Improvement Plan) provided as an attachment to Alltel's Application. This attachment is labeled "Confidential — Not for Public Inspection."

Exhibit D contains proprietary company information not available to the public, including information that is competitively sensitive about Alltel's future plans for building out its network.

As required by Section 0.459(b) of the Commission's rules, Alltel provides the following information regarding its request for confidential treatment:

- 1. Confidential treatment is requested for all information contained in Exhibit D.
- 2. This information is submitted as an attachment to Alltel's Application being filed in the Commission's universal service docket, CC Docket No. 96-45.
- 3. The information being submitted is commercially and financially sensitive and is privileged. Exhibit D provides detailed financial information regarding how Alltel intends to spend its universal service funds in certain wire centers over the next five

¹ 47 C.F.R. § 0.459.

Federal Communications Commission October 13, 2005 Page 2

years. Also, Alltel is providing in Exhibit D general information as how it intends to spend this funding, (i.e., for capacity or coverage enhancements).

- 4. The wireless industry is highly competitive.²
- 5. The release of such information will cause substantial competitive harm to Alltel. Disclosure of Alltel's five-year plans for its expenditures of universal service funds would give Alltel's competitors access to privileged information that would affect the actions of those competitors. Competitors seeking to compete with Alltel could upgrade their networks in an attempt to, for example, preempt Alltel's planned upgrades. Also, by providing information about where Alltel intends to expand coverage, Alltel could expose itself to predatory practices by tower owners and potential tower site owners in areas where it committed to add cell sites.
- 6. Alltel considers the information in Exhibit D to be proprietary and confidential and does not distribute such information to any party outside of the company, with the exception of outside counsel.
- 7. The information in Exhibit D is not available to the public and has not been disclosed to any other third party, with the exception of outside counsel.
- 8. The information provided in Exhibit D should never be released for public inspection, as this document contains proprietary company information that is competitively and financially sensitive. Even after the five-year term of the plan expires, Alltel would not reveal to its competitors the amount of money it has spent in the past in certain wire centers.

For the foregoing reasons, Alltel respectfully requests that the Commission allow for confidential treatment of Exhibit D.

If you have any questions regarding this supplemental information or the confidentiality request, please contact the undersigned.

Respectfully submitted,

Glenn S. Rabin

Vice President

Federal Communications Counsel

S. Kabin/dmx

² See Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993, Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services, Eighth Report, 18 F.C.C.R. 14783, 14812 (2003) ("Continued downward price trends, the continued expansion of mobile networks into new and existing markets, high rates of investment, and churn rates of about 30%, when considered together with the other metrics, demonstrate a high level of competition for mobile telephone consumers."); Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993, Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services, Ninth Report, 19 F.C.C.R. 20597, 20600-01 (2004) ("[C]ompetition is robust in terms of the current number of competitors per market ..." and "[i]ndicators of market performances show that competition continues to afford many significant benefits to consumers.").

Before The FEDERAL COMMUNICATIONS COMMISSION Washington, D. C.

in the Matter of)	
Application of Alltel Communications, Inc.)	
)	Docket No. 96-45
)	
For Designation as an Eligible)	
Telecommunications Carrier Pursuant To)	
Section 214(e)(6) of the Communications)	
Act of 1934)	

APPLICATION OF ALLTEL COMMUNICATIONS, INC. FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE STATE OF GEORGIA

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Date: October 13, 2005

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APPLICATION OF ALLTEL COMMUNICATIONS, INC. FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE STATE OF GEORGIA

Alltel Communications, Inc., on behalf of itself and its wholly-owned and controlled licensee affiliates ("Alltel" or "Company"), and pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended (the "Act"), hereby petitions the Commission for designation as an Eligible Telecommunications Carrier ("ETC") in the rural and non-rural telephone company areas within its licensed service area in the State of Georgia ("Application"). By Order issued September 24, 2004 the Commission designated Alltel ETC status in certain non-rural telephone company wire centers within its licensed service area. As demonstrated below, Alltel meets all the statutory and regulatory prerequisites for ETC designation in the requested areas, and Alltel's designation will serve the public interest.

¹ Federal-State Joint Board on Universal Service; ALLTEL Communications Inc., Petitions for Designation as an Eligible Telecommunications Carriers in the States of Alabama, Florida, Georgia, North Carolina, and Virginia, Order, 19 FCC Rcd 20496 (WCB 2004) ("Alltel Non-Rural Designation Order").

I. Alltel's Universal Service Offering.

Alltel is the licensee authorized to provide cellular mobile radio telephone service in the following Cellular Market Areas ("CMAs") in Georgia: CMA 108, CMA 153, CMA 155, CMA 261, CMA 375, CMA 376, CMA 377, CMA 378, CMA 379, CMA 380, CMA 381, CMA 382, CMA 383 and CMA 384.² Alltel intends to obtain high-cost support in the rural telephone company areas to expand its coverage to include unserved or underserved areas, to increase the service quality and reliability of its network, and to speed the delivery of advanced wireless services to the citizens of Georgia. As an ETC, Alltel will also offer a basic universal service package to subscribers who are eligible for Lifeline support and will offer Link-Up to eligible subscribers. Alltel's service offering will be competitive with those of the incumbent local exchange carriers ("LECs").

II. Alltel Satisfies All the Statutory and Regulatory Prerequisites for Designation as an ETC.

Alltel satisfies each of the elements enumerated by the Commission for ETC designation pursuant to Section 214(e)(6) of the Act as set forth in the FCC's Section 214(e)(6) Public Notice.³

A. The Georgia Public Service Commission Has Provided an Affirmative Statement That It Does Not Regulate CMRS Carriers.

As a CMRS carrier, Alltel is entitled to seek designation as an ETC.⁴ Section 254(e) of the Act provides that "only an eligible telecommunications carrier designated under section

² The areas that Alltel seeks designation for within its licensed area will be referred to in this document as the "ETC Service Area."

³ FCC Public Notice, *Procedures for FCC Designation of Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act*, 12 FCC Rcd 22947 (1997) ("Section 214(e)(6) Public Notice").

⁴ See Federal-State Joint Board on Universal Service, First Report and Order, 12 FCC Rcd 8776, 8858-59 (1997) ("First Report and Order").

214(e) shall be eligible to receive specific federal universal service support."⁵ Pursuant to Section 214(e)(6) of the Act, the Commission may, upon request, designate as an ETC "a common carrier providing telephone exchange service and exchange access that is not subject to the jurisdiction of a state commission."⁶

In the Section 214(e)(6) Public Notice, the Commission established that a carrier must demonstrate it "is not subject to the jurisdiction of a state commission." In its Twelfth Report and Order, the Commission stated that where a carrier provides the Commission with an "affirmative statement" from the state commission or a court of competent jurisdiction that the state lacks jurisdiction to perform the designation, the Commission would consider requests filed pursuant to 214(e)(6).

On April 29, 2003, Alltel Communications, Inc. filed a Petition for Declaratory ruling with the Georgia Public Service Commission ("GPSC") seeking an affirmative statement from the GPSC that it lacked jurisdiction to grant Alltel, a CMRS carrier, ETC status for purposes of receiving federal universal service support. By letter issued July 2, 2003, the GPSC affirmed that Alltel Communications, Inc. is not subject to the jurisdiction of the State of Georgia for purposes of determining eligibility for Eligible Telecommunications Carrier designation under 47 U.S.C. Section 214(e) and 47 C.F.R. Section 54.201 *et seq.* A copy of the GPSC administrative letter is attached to this application as Exhibit B.9

⁵ 47 U.S.C. § 254(e).

⁶ 47 U.S.C. § 214(e)(6).

⁷ Section 214(e)(6) Public Notice, 12 FCC Rcd at 22948.

⁸ Federal-State Joint Board on Universal Service; Promoting Deployment and Subscribership in Unserved and Underserved Areas, Including Tribal and Insular Areas, Twelfth Report and Order, and Further Notice of Proposed Rulemaking, 15 FCC Rcd 12208, 12264 (2000).

⁹ The FCC previously has processed ETC petitions in Georgia. *See, e.g., Alltel Non-Rural Designation Order, supra* n.1.

B. Alltel Offers All of the Services Supported By the Federal High-Cost Universal Service Program.

In order to be designated as an ETC, a carrier must be a common carrier and both offer and advertise the supported services throughout the designated service area.¹⁰ The FCC has identified the following services and functionalities as the core services to be offered by an ETC and supported by federal universal service support mechanisms:¹¹

- 1. Voice-grade access to the public switched telephone network;
- 2. Local usage;
- 3. Dual-tone, multi-frequency ("DTMF") signaling, or its functional equivalent;
- 4. Single-party service or its functional equivalent;
- 5. Access to emergency services;
- 6. Access to operator services;
- 7. Access to interexchange service;
- 8. Access to directory assistance; and
- 9. Toll limitation for qualifying low-income consumers.

The Section 214(e)(6) Public Notice requires a carrier to certify that it provides each of the supported services, or where appropriate, functionally equivalent services. As shown below and in the Declaration attached as Exhibit A hereto, Alltel currently provides, or will provide upon designation, each of the required services.

¹⁰ 47 U.S.C. § 214(e)(1).

¹¹ See 47 C.F.R. § 54.101(a).

¹² Section 214(e)(6) Public Notice, 12 FCC Rcd at 22948.

1. <u>Voice-grade access to the public switched telephone network:</u>

The FCC concluded that voice-grade access means the ability to make and receive phone calls within a specified bandwidth.¹³ Alltel meets this requirement by providing voice-grade access to the public switched telephone network. Through its interconnection arrangements with LECs, each of Alltel's customers is able to make and receive calls on the public switched telephone network within the specified bandwith.

2. Local usage:

Section 54.202(a)(4) of the FCC's rules require an ETC applicant to "demonstrate that it offers a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation." The FCC has explained that an ETC applicant's local usage plans should be reviewed on a case-by-case basis to ensure that each ETC provides a local usage component in its universal service offering that is comparable to the plan offered by the incumbent LEC in the area. The FCC has declined to adopt a specific local usage threshold. Alltel commits to provide rate plans that have a substantial local calling area with a corresponding level of included local usage that provides an outstanding consumer value. A description of Alltel's current rate plans that are available in the areas for which Alltel seeks ETC designation is attached as Exhibit C hereto. Exhibit C confirms that Alltel includes local usage in each rate plan and that Alltel offers local calling areas that are substantially larger than those offered by the incumbent LECs. Further, since Alltel offers several rate plans as its

¹³ First Report and Order, 12 FCC Rcd at 8810-11.

¹⁴ 47 C.F.R. § 54.202(a)(4).

¹⁵ Federal–State Joint Board on Universal Service, Report and Order, 20 FCC Rcd 6371 (2005) ("ETC Criteria Order").

¹⁶ *Id.* at 6385.

universal service offering, customers have the opportunity to select a rate plan that best meets their needs based on the local calling areas and the amount of local calling included in each plan.

3. <u>Dual-tone</u>, <u>multi-frequency</u> ("DTMF") <u>signaling</u>, <u>or its functional</u> <u>equivalent:</u>

DTMF is a method of signaling that facilitates the transportation of call set-up and call detail information. Consistent with the principles of competitive and technological neutrality, the FCC permits carriers to provide signaling that is functionally equivalent to DTMF in satisfaction of this service requirement.¹⁷ Alltel currently uses out-of-band digital signaling, and Alltel therefore meets this requirement.

4. Single-party service or its functional equivalent:

"Single-party service" means that only one party will be served by a subscriber loop or access line in contrast to a multi-party line.¹⁸ The FCC concluded that a wireless provider offers the equivalent of single-party service when it offers a dedicated message path for the length of a user's particular transmission.¹⁹ Alltel meets the requirement of single-party service in this manner.

5. Access to emergency services:

The ability to reach a public emergency service provider by dialing 911 is a required service in any universal service offering. Alltel currently provides its customers with access to emergency services by dialing 911 in accord with this requirement throughout the geographic area where it is seeking ETC designation. Further, Alltel provides both automatic numbering information ("ANI") and automatic location information ("ALI") to public emergency service

¹⁷ 47 C.F.R. § 54.101(a)(3).

¹⁸ First Report and Order, 12 FCC Rcd at 8810.

¹⁹ *Id*.

providers capable of both receiving and utilizing the data and has made arrangements for the delivery of the data.

6. Access to operator services:

Access to operator services is defined as any automatic or live assistance provided to a consumer to arrange for the billing or completion, or both, of a telephone call.²⁰ Alltel meets this requirement by providing all of its customers with access to operator services provided by either the Company or other entities (*e.g.* LECs, IXCs, etc.)

7. <u>Access to interexchange service:</u>

A universal service provider must offer consumers access to interexchange service to make and receive toll or interexchange calls. Alltel presently meets this requirement by providing all of its customers with the ability to make and receive interexchange or toll calls through direct interconnection arrangements between the Company and several IXCs. On most of the Company's rate plans, interexchange calls can be made for no additional charge (*i.e.*, all outgoing minutes are treated the same). Additionally, customers are able to reach other IXCs by dialing the appropriate access code or dial-around number.

8. Access to directory assistance:

The ability to place a call to directory assistance is a required service offering.²¹ Alltel meets this requirement by providing all of is customers with access to directory assistance by dialing either "411" or "Area Code + 555-1212."

²⁰ *Id.* at 8817-18.

²¹ *Id.* at 8821.

9. <u>Toll limitation for qualifying low-income consumers:</u>

An ETC must offer either "toll control" or "toll blocking" services to qualifying Lifeline customers at no charge. The FCC no longer requires an ETC to provide both services as part of the toll limitation service.²² In particular, all ETCs must provide toll blocking, which allows customers to block the completion of outgoing toll calls.²³ Once designated as an ETC, Alltel will participate in Lifeline as required and will provide toll blocking capability in satisfaction of the FCC's requirement. Alltel currently has the capability to provide toll blocking and will provide this service at no charge to its Lifeline customers.

C. Alltel Meets the Additional Eligibility Criteria Adopted by the FCC in the *ETC Criteria Order*.

The FCC's March 17, 2005 ETC Criteria Order established additional criteria that all ETC applicants must satisfy in order to be granted ETC status. The FCC found that an ETC applicant must demonstrate: (1) a commitment and ability to provide the supported services throughout the designated area; (2) the ability to remain functional in emergency situations; (3) that it will satisfy consumer protection and service quality standards; (4) that it offers local usage comparable to that offered by the incumbent LEC; and (5) an understanding that it may be required to provide equal access if all other ETCs in the designated service area relinquish their designations pursuant to Section 214(e)(4) of the Act.²⁴

1. <u>Commitment and Ability to Provide the Supported Services:</u>

Section 54.202(a)(1) of the FCC's rules require an ETC applicant to demonstrate its commitment and ability to provide the supported services throughout the designated service area by: (a) committing to provide service throughout its proposed ETC designated service

²² 47 C.F.R. § 54.101 (a)(9); see Federal-State Joint Board Universal Service, Fourth Order on Reconsideration, 13 FCC Rcd 5318, 5388 (1997).

²³ First Report and Order, 12 FCC Rcd at 8821-22.

area to all potential customers making a reasonable request for service; and (b) submitting a five-year plan demonstrating how high-cost universal service support will be used to improve the Company's coverage, service quality and capacity throughout the service area for which it seeks ETC designation.

a. <u>Commitment to Serve All Customers Making a Reasonable Request for Service:</u>

Alltel certifies that: (1) it will provide service throughout the proposed ETC area using its standard customer equipment and service offerings where available; or (2) if a request within Alltel's licensed service area but outside its existing network coverage is received from a potential customer, Alltel will follow the steps described in Section 54.202(a)(1)(a) of the FCC's rules. If, after following the steps specified therein, Alltel still cannot provide service, it will notify the requesting party and report the unfulfilled request to the Commission within 30-days after making such a determination. Furthermore, consistent with the requirement in Section 54.209(a)(3) of the FCC's rules, Alltel will annually report the number of requests from potential customers that were unfulfilled during the pervious year. Alltel submits that the above described service provisioning commitments satisfy the FCC's requirements in Section 54.202(a)(1)(a) and ensures that Alltel is responsive to consumers' needs in the ETC Service Area, while acting as a proper steward of available high-cost support funds.

b. Five-Year Service Improvement Plan:

Alltel submits its proposed five-year service improvement plan ("Plan"), attached hereto as Exhibit D, is in accordance with Section 54.202(a)(1)(b) of the FCC's rules. Alltel's Plan contains highly confidential information, and therefore, will be submitted separately in accordance with Section 0.459 of the Commission's rules. The Plan describes projected improvements in both the previously approved non-rural areas and the additional rural and non-

²⁴ See ETC Criteria Order, 20 FCC Rcd at 6386-87.

rural areas in which Alltel seeks ETC designation in this Application. The capital expenditures in the Plan represent substantially greater levels of financial commitment than Alltel would commit in the absence of high-cost support. As represented in the Plan, Alltel also will incur expenses associated with upgrading, maintaining and operating its existing network in the ETC Service Area, which is an equally appropriate use of high-cost funds. Alltel submits that these plans must be flexible and are subject to change in response to general consumer demand, changes in technology and other appropriate factors. The priority under which each cell site is to be constructed is subject to change depending upon requests for service and other market factors. Alltel also commits to annually provide the Commission a progress report consistent with Section 54.209(a)(1) of the FCC's rules. Alltel believes the five-year plan attached hereto as Exhibit D satisfies the requirements of the FCC's rules and constitutes a good faith estimate of the universal service benefits – due to expanded coverage and improved signal and service quality – that rural and non-rural customers in the state of Georgia will enjoy if the Commission designates Alltel as an ETC in the requested areas.

2. <u>Ability to Remain Functional in Emergency Situations:</u>

Alltel is able to remain functional in emergency situations. Alltel's network is designed to remain functional in emergency situations. Alltel has adequate amounts of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities and is capable of managing traffic spikes resulting from emergency situations.²⁵

Alltel has deployed fixed and portable back-up power generators at various locations throughout its network that can be deployed in emergency situations. These back-up power generators are capable of keeping a cell site up and running until power is restored to the

²⁵ See 47 C.F.R. § 54.202(a)(2).

cell site, until system changes are made to reroute traffic or until a cell site on wheels ("COWs") is deployed. Alltel tests its back-up power generators regularly to ensure functionality. Alltel is capable of and will reroute traffic around damaged or out-of-service facilities by changing call routing translations as needed. Alltel also is able to deploy COWs as temporary cell sites when existing facilities are damaged or out of service for longer periods of time. Further, by changing call routing translations or deploying COWs, Alltel is able to manage traffic spikes throughout its network. As a long-term solution for managing increased traffic levels and traffic spikes, Alltel will increase capacity at its cell sites, switches and transport facilities.

Finally, in accordance with FCC rule Section 54.209(a)(6) of the FCC's rules, Alltel will annually certify that it is able to function in emergency situations. Alltel also will fulfill the annual outage reporting requirement described in Section 54.209(a)(2) of the FCC's rules. Section 54.209(a)(2) of the FCC's rules requires an ETC applicant to submit detailed information on any outage of at least 30 minutes in duration that potentially affects (a) at least ten percent of the end users served in a designated service area; or (b) a 911 special facility. Specifically, such a report must include information detailing: (a) the date and time of onset of the outage; (b) a brief description of the outage and its resolution; (c) the particular services affected; (d) the geographic areas affected by the outage; (e) steps taken to prevent a similar situation in the future; and (f) the number of customers affected.²⁶

3. Consumer Protection:

Section 54.202(a)(3) of the FCC's rules states that an ETC applicant must "demonstrate that it will satisfy applicable consumer protection and service quality standards." A commitment by wireless applicants to comply with the Cellular Telecommunications and

²⁶ See 47 C.F.R. § 54.209 (a)(2).

²⁷ 47 C.F.R. § 54.202(a)(3).

Internet Association's Consumer Code for Wireless Service ("CTIA Consumer Code") will satisfy this requirement. Other commitments will be considered on a case-by-case basis. Alltel has already committed to abide by the CTIA Consumer Code for its entire wireless operations across the country, not simply those states in which it seeks ETC status. Although its commitment to this Code goes well beyond a simple inducement to the Commission for the grant of ETC status, Alltel specifically commits that, as an ETC, Alltel will abide by the CTIA Consumer Code with respect to its ETC Service Area.²⁸

In addition to its commitment to the CTIA Consumer Code, Alltel has taken several steps, on its own initiative, to further protect its customers and enhance service quality. For example, Alltel offers its customers an automatic one-minute credit for all dropped calls on its network. Alltel does not require a customer to call and report such instances. Instead, Alltel monitors its network for dropped calls and automatically credits customers' accounts for dropped calls. In another initiative, in recognition of the fact that changing circumstances and needs may require customers to opt for a different rate plan, Alltel offers its customers the ability to change rate plans at anytime without extending their current service contracts. These are two initiatives taken by Alltel to further protect its customers. As noted, if designated as an ETC, Alltel will satisfy the requirements in Sections 54.209(a)(5) and 54.209(a)(4) by annually certifying its compliance with the CTIA Consumer Code and annually reporting the number of customer complaints per thousand handsets.

4. Local Usage:

As described Section II.B.2 of this Application and as demonstrated in Exhibit C hereto, Alltel is committed to offering local usage plans comparable to those offered by the incumbent LEC in the service areas for which it seeks designation. Each of Alltel's service plans

²⁸ Alltel recently re-certified it's compliance with the CTIA Consumer Code.

described in Exhibit C are within the scope of "comparability" as defined by the FCC in the ETC Criteria Order.²⁹ Further, Alltel will annually certify that it offers local usage plans that are comparable to those offered by the incumbent LEC in the relevant areas in accordance with Section 54.209(a)(7) of the FCC's rules.

5. <u>Equal Access:</u>

In accordance with Section 54.202(a)(5) of the FCC's rules, Alltel acknowledges that the Commission may require it to provide equal access to long-distance carriers in the event that no other ETC is providing equal access within the designated ETC Service Area.³⁰ Further, pursuant to Section 54.209(a)(8), Alltel will file an annual certification acknowledging the fact that it may be required to provide equal access to long-distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area.

D. Alltel Will Offer Supported Services Using a Combination of its Own Facilities and Resale of Another Carrier's Services.

The Commission's Section 214(e)(6) Public Notice established that a carrier requesting designation must certify that it offers the supported services "either using its own facilities or a combination of its own facilities and resale of another carrier's services." Alltel will provide the supported services using its own network infrastructure, consisting of antennas, cell sites, towers, trunkings, mobile switching and interconnection facilities. Alltel may, on a limited basis, provide service through resale of another carrier's service in areas lacking adequate coverage. See also Exhibit A.

²⁹ ETC Criteria Order, 20 FCC Rcd at 6385.

³⁰ 47 C.F.R. § 54.202(a)(5).

³¹ Section 214 Public(e)(6) Public Notice, 12 FCC Rcd at 22949.

E. Alltel Will Advertise its Universal Service Offering.

Alltel will advertise the availability of the supported services and the corresponding charges in a manner that fully informs the general public within the ETC Service Area of both the available services and the associated rates.³² Alltel currently advertises its services through a variety of advertising media, including newspapers, television, radio, public exhibits and displays, and the Company website. Alltel will utilize the same media to advertise the universal service offerings throughout the ETC Service Area. Further, Alltel commits to advertise the availability of Lifeline and Link-Up discounts throughout the ETC Service Area.

III. Alltel Requests ETC Designation in Additional "Non-Rural" Wire Centers and the "Rural" Study Areas Within its Licensed Service Area in the State of Georgia.

Alltel, in its capacity as a provider of cellular services, is not a "rural telephone company" as that term is defined by 47 U.S.C. Section 153(37). Accordingly, Alltel is required to describe the geographic area in which it requests designation.³³ In this Application, Alltel requests ETC designation in the "rural" study areas depicted on the maps attached hereto as Exhibits E, F-2, G-2 and listed in Exhibits F and G, within its licensed service area in the State of Georgia.³⁴

Pursuant to Section 54.207 of the Commission's rules, a "service area" is a "geographic area established by a state commission for the purpose of determining universal service obligations and support mechanisms." In an area served by a rural telephone company, the Commission's rules define "service area" to mean the LEC study area unless a different

³² See id.

 $^{^{33}}$ Id

As noted above, Alltel previously was designated as an ETC in the non-rural portions of its licensed territory in Georgia. *See supra* n.1.

³⁵ 47 C.F.R. § 54.207(a).

definition of service area is established for such company.³⁶ The rural LEC study areas that Alltel serves in their entirety and non-rural wire centers that Alltel serves and in which Alltel seeks designation in this application are set forth in Exhibit F attached hereto. The maps attached hereto as Exhibits F-1 and F-2 confirm that the rural study areas identified in Exhibit F are entirely within Alltel's licensed area. The Commission may designate Alltel as an ETC in those areas upon a finding that such designation is in the public interest (see Section V below).³⁷ The map attached as Exhibit F-3 confirms that the non-rural wire centers identified in Exhibit F are entirely within Alltel's licensed area. The Commission shall designate such areas, consistent with the public interest, convenience, and necessity.³⁸

In situations where Alltel is not licensed to serve a rural ILEC study area in its entirety, Alltel may be designated as an ETC once the Commission redefines the ILEC's service area in accordance with Section 54.207(c)(1) of the FCC's rules. As set forth in Section IV below, Alltel requests a redefinition of those rural ILEC study areas that it partially serves on a wire center by wire center basis. Where Alltel is not licensed to serve a rural ILEC study area in its entirety, Alltel requests that it be designated as an ETC only in those wire centers in which it provides service in its entirety. The wire centers that are not served or are only partially served within the rural LECs' study areas are identified in Exhibits G and G-2 and should be excluded from Alltel's ETC Service Area.³⁹ Accordingly, where Alltel serves only a portion of a wire

³⁶ See 47 C.F.R. § 54.207(b); see also Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers, Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking, 16 FCC Rcd 11244 (2001) ("MAG Fourteenth Report and Order").

³⁷ 47 U.S.C. § 214(e)(2).

³⁸ *Id. See also* Section V below.

³⁹ In column four of Exhibit G, "Yes" indicates that Alltel serves the applicable wire center in its entirety, and "No" indicates that Alltel either does not serve or only partially serves the applicable wire center.

center, it does not request ETC status for that wire center. Since the GPSC does not assert jurisdiction over CMRS carriers, including the designation of a cellular carrier as an ETC,⁴⁰ the Commission has jurisdiction to consider redefinition of the ILEC service areas in Georgia for ETC purposes, as set forth in Section IV below.

IV. Alltel Requests that Affected Rural LEC Service Areas be Redefined.

Alltel requests that the Commission redefine the service areas of Alltel Georgia, Inc., Alltel Georgia Communications, Corp., Georgia Alltel Telecom Inc.,⁴¹ Plant Telephone Company, Public Service Telephone Company and Wilkes Telephone and Electric Company ("Rural LECs") on a wire center by wire center basis. However, to the extent that redefinition already has been granted in the above service areas to other carriers, the redefinition request should be treated as moot under the terms of the *Epic Touch Public Notice*.⁴²

Absent redefinition of these service areas, Alltel would be prohibited from being designated as a competitive ETC in any of the wire centers within these rural telephone company study areas where it can serve today. Redefinition of the service areas identified in Exhibits G, G-1 and G-2 on a wire center by wire center basis will foster competition and offer customers in the exchanges that are served by Alltel a competitive universal service offering. Further, redefinition of these areas will serve the public interest by bringing the benefits described in Section V to the areas that Alltel is licensed to serve.

⁴⁰ See Exhibit B.

⁴¹ Alltel Georgia, Inc., Alltel Georgia Communications, Corp. and Georgia Alltel Telecom Inc are corporate affiliates by virtue of common ownership by Alltel Corporation.

⁴² FCC Public Notice, *Dismissal of Epic Touch Co.'s Petition for Redefinition of Service Area of Pioneer Telephone Association, Inc.* DA 05-2431, CC Docket No. 96-45 (rel. Sept. 8, 2005). In this *Public Notice*, the Commission dismissed as moot Epic Touch Co.'s petition with the Commission for redefinition of Pioneer Telephone Association, Inc.'s service area since redefinition of this service area already had been granted as a result of another carrier's petition. As such, the *Public Notice* indicates that once redefinition is granted of a service area to one carrier, no further redefinition approval is required from a different carrier for that service area.

Pursuant to Section 54.207(b)-(c) of the Commission's rules, ⁴³ a petition to redefine a rural LEC service area must include an analysis that takes into account the recommendations of the Federal-State Joint Board convened to provide recommendations with respect to the definition of a service area served by a rural telephone company. The *ETC Criteria Order* did not amend Section 54.207; this decision, however, added new Section 54.202(c) to the rules, which specifies that "in instances where an [ETC] applicant seeks designation below the study area level of a rural telephone company, the Commission shall also conduct a creamskimming analysis that compares the population density of each wire center in which the [ETC] applicant seeks designation against that of the wire centers in the study area in which the [ETC] applicant does not seek designation."⁴⁴ This requirement is consistent with the first prong of the analysis laid out by the Joint Board, as required by Section 54.207(b). As discussed below, Alltel's request meets the requirements of Sections 54.202(c) and 54.207.

In the *Recommended Decision* that laid the foundation for the Commission's *First Report* and *Order*, 45 the Federal-State Joint Board enumerated three factors to be considered when redefining a rural service area. The first factor, as noted above, is whether the competitive carrier is attempting to "creamskim" by only proposing to serve the lowest cost exchanges. 46 As a wireless carrier, Alltel is restricted to providing service in those areas where it is licensed by the Commission. Alltel intends to exclude certain wire centers only because they fall outside of Alltel's licensed area. Exhibits G-1 and G-2 clearly illustrate the fact that Alltel is seeking to

⁴³ 47 C.F.R. § 54.207(b)-(c).

⁴⁴ 47 C.F.R. § 54.202(c). The rule prescribes the creamskimming analysis as part of the public interest analysis. To avoid repetition, the discussion of creamskimming is contained solely in this redefinition section. *See also infra* section V.C. (cross-referencing the instant discussion).

⁴⁵ Federal-State Joint Board on Universal Service, Recommended Decision, 12 FCC Rcd 87 (1996) ("Joint Board Recommended Decision").

⁴⁶ *Id.* at 179-80.

exclude only wire centers that fall outside of its licensed area. It is clear there is no deliberate effort by Alltel to creamskim by picking and choosing the lowest cost exchanges. Alltel's requested ETC area is based solely upon its licensed service area.

In Virginia Cellular, the FCC elaborated on its creamskimming analysis by relying on population density data that was submitted to demonstrate a lack of creamskimming effects.⁴⁷ This population density analysis has since been codified in Section 54.202(c). The population density data set forth in Exhibit H demonstrates that redefinition of the Georgia ILEC service areas will not result in creamskimming effects. As demonstrated in Exhibit H, the population density data establishes that the average population density of the Plant Telephone Company wire centers "served" by Alltel is 29.30 persons per square mile, and therefore is only slightly higher than the population density of the Plant Telephone Company wire center that is "not served," which is 16.20 persons per square mile. This difference is not significant when compared with the magnitude of the differences found to raise creamskimming concerns in Virginia Cellular and Highland Cellular. 48 Further, the served area includes three wire centers that are roughly comparable in density to the unserved wire center (Pearson, 24.14; Willacoochee, 21.36; and Warwick, 23.37). Moreover, the population density of the "served" areas in all the other rural LEC study areas is actually *lower* than the population density in the "unserved" areas. Thus, redefinition of those study areas listed in Exhibit G on a wire center by

Virginia Cellular, LLC, Petition for Designation as an Eligible Telecommunications Carrier In the Commonwealth of Virginia, Memorandum Opinion and Order, 19 FCC Rcd 1563, 1578-80 (2004) ("Virginia Cellular").

See id. at 1579-80 (finding that it would not be in the public interest to designate Virginia Cellular in NTELOS' study area because the population density in the served wire center would be approximately 273 persons per square mile, while the average population density of the remaining wire centers would be 33 persons per square).

wire center basis will not harm the Rural LECs' ability to serve their entire study area or otherwise raise concerns of creamskimming effects.⁴⁹

Second, the Joint Board urged the Commission to consider the rural carrier's special status under the Telecommunications Act of 1996.⁵⁰ Alltel submits that a Commission decision to designate Alltel as an ETC in the rural LEC areas in this proceeding will not affect or prejudge any future action the Commission may take with respect to the rural LECs' special status as a rural telephone company, which is afforded pursuant to Section 251 of the Act. Further, because the Commission must weigh the relevant factors and consider the manner in which the public interest is affected prior to designating Alltel as an ETC pursuant to Section 214(e)(2), the Commission's public interest evaluation would duly recognize the special status of the rural LECs.

Finally, the Federal-State Joint Board recommended that the FCC consider the administrative burden a rural LEC would face by calculating its costs on a basis other than its entire study area.⁵¹ In the instant case, Alltel is proposing to redefine rural LEC service areas solely for ETC designation purposes. Redefining service areas for ETC purposes will in no way impact the way the affected rural LECs calculate their costs, but it is solely to determine the LEC area in which Alltel is to be designated as an ETC. Further, LECs may disaggregate their study areas to reallocate high-cost loop support payments pursuant to the FCC's *MAG Order*.⁵²

⁴⁹ In the event the Commission concludes that the population density disparity between the served and the unserved portions of any of these study areas is sufficiently great to present creamskimming concerns, Alltel proposes to withdraw certain dense wire centers from the proposed ETC Service Area in order to equalize the density between the served and the unserved areas.

Joint Board Recommended Decision, 12 FCC Rcd at 180.

⁵¹ *Id*.

Multi-Association Group (MAG) Plan for Regulation of Interstate Services of Non-Price Cap Incumbent Local Exchange Carriers and Interexchange Carriers; Federal-State Joint Board on Universal Service, Second Report and Order and Further Notice of Proposed

Accordingly, redefining rural LEC service areas as proposed herein will not impose any additional burdens on the rural LECs.

V. Granting This Application Will Serve the Public Interest.

Prior to designating an eligible telecommunications carrier, the Commission must determine that such a designation is in the public interest. The Commission, in the ETC Criteria Order, codified a fact-specific public interest analysis it had developed in prior orders as the appropriate process for determining that an ETC designation is in the public interest. The Commission determined that, in the case of an applicant seeking designation in an area served by a rural telephone company, it will consider the benefits of increased consumer choice, and the unique advantages and disadvantages of the applicant's service offering, as well as creamskimming issues when redefinition is requested. The Commission has stated that it will consider the same public interest factors in ruling on ETC petitions for non-rural areas, though the factors may be applied differently because of the lower statutory standard for ETC designation in non-rural areas. As demonstrated below, the Commission should find that designating Alltel as an ETC will serve the public interest.

A. Benefits of Increased Consumer Choice.

The FCC has recognized that designation of wireless ETCs promotes competition and benefits consumers in high-cost areas by increasing consumer choice, availability of innovative services and deployment of new technologies. Designating Alltel as an ETC in these high-cost areas will bring to rural customers the benefits described above that are otherwise available mostly to urban customers. Availability of universal service funds will enable Alltel to improve

Rulemaking in CC Docket No. 00-256, Fifteenth Report and Order in CC Docket No. 96-45, and Report and Order in CC Docket Nos. 98-77 and 98-166, 16 FCC Rcd 19613 (2001).

⁵³ 47 U.S.C. § 214(e)(6); 47 C.F.R. § 54.202(c).

⁵⁴ ETC Criteria Order. 20 FCC Rcd at 6392.

service quality and coverage in areas that it currently serves, and expand its services into areas that would not be economically feasible to serve absent universal service funding.

Universal service funding will enable Alltel to continue to operate and maintain a higher number of cell sites in high-cost, low-density areas. Upon ETC designation, Alltel will offer qualifying customers a choice in their Lifeline/Link-Up provider. The mobility of wireless service will offer qualifying Lifeline/Link-Up customers an alternative means of communications that they do not currently enjoy. Further, improving and expanding the choices available to consumers will not only strengthen inter-modal wireless/wireline competition but also increase intra-modal wireless competition to the benefit of telecommunications customers throughout Georgia. Finally, increased competition in these areas provides incentives to incumbent service providers to achieve new operating efficiencies and introduce additional choices, higher quality and better value to their customers.

B. Unique Advantages and Disadvantages of Alltel's Service Offering.

Designating Alltel as an ETC will also bring customers the unique advantages of mobility. The FCC recognized the unique advantages of mobility when it stated that:

[T]he mobility of telecommunications assists consumers in rural areas who often must drive significant distances to places of employment, stores, schools, and other critical community locations. In addition, the availability of a wireless universal service offering provides access to emergency services that can mitigate the unique risks of geographic isolation associated with living in rural communities.⁵⁵

Further, because Alltel's local calling areas are significantly larger than those of the incumbent LEC, Alltel's customers will be subject to fewer toll charges and be able to communicate across greater distances more frequently. Alltel will make available several offerings to its customers with varying amounts of local calling and different local calling areas,

⁵⁵ Virginia Cellular, 19 FCC Rcd at 1576.

allowing customers to choose a universal service offering that best suits their particular calling needs.

The Commission has acknowledged that the disadvantages of wireless service may include dropped calls and poor coverage.⁵⁶ However, the FCC found that Virginia Cellular's assurances to build new towers to improve coverage, its commitments to comply with the CTIA Code for Wireless Service and annually report the number of complaints per thousand handsets, adequately addressed any concerns about the quality of Virginia Cellular's service.⁵⁷ Alltel understands that its business is built on customer satisfaction as evidenced by its recent initiative to voluntarily credit customers' accounts for dropped calls. Further, Alltel is a signatory to the CTIA Consumer Code for its entire operations, not only its ETC designated areas.

In addition, Alltel commits to maintain and construct cell sites in order to improve coverage, service quality and capacity. Attached as Exhibit D is Alltel's five-year plan demonstrating how high-cost universal service support will be used to improve its network. Finally, as described in Section II.C.1 of this Application, Alltel has committed to respond to reasonable requests for service from potential customers that are within its ETC Service Area, as required by Section 54.202(a)(1)(A) of the Commission's rules. In instances where a request for service is received from a potential customer within the ETC area but outside Alltel's existing network coverage, Alltel has committed to take the steps required by the rules to respond to such a request. Alltel's commitments to a network improvement plan and to respond to reasonable requests for service within the designated area mitigate any concerns that may exist regarding Alltel's network quality. Thus, grant of this petition will serve the public interest.

⁵⁶ *Id.* at 1576-77

⁵⁷ *Id*.

C. Creamskimming.

As demonstrated in detail in Section IV of this Application and Exhibit H attached hereto, there is no evidence of intentional creamskimming by Alltel, or creamskimming effects, in the two study areas that Alltel serves partially. Therefore, designating Alltel as an ETC is in the public interest and the Commission should expeditiously proceed to grant this Petition.

VI. High-Cost Certification.

Under Sections 54.313 and 54.314 of the Commission's rules, carriers wishing to obtain high-cost support must either be certified by the appropriate state commission or, where the state commission does not exercise jurisdiction, must self-certify with the FCC and the Universal Service Administration Corporation ("USAC") their compliance with Section 254(e) of the Act. As explained above, the GPSC does not exercise jurisdiction over CMRS carriers such as Alltel. Therefore, in accordance with Sections 54.313(b) and 54.314(b) of the FCC's rules, Alltel commits to use available federal high-cost support for its intended purposes – the provision, maintenance and upgrading of facilities serving the areas for which support is intended. See Exhibit A.

Additionally, Alltel has submitted its high-cost certification with the FCC and USAC. A copy of this certification is attached hereto as Exhibit I. Alltel respectfully requests that the Commission issue a finding that Alltel has met the high-cost certification requirement and that Alltel is, therefore, entitled to begin receiving high-cost support as of the date it receives a grant of ETC status in order that funding will not be delayed.⁵⁹

⁵⁸ 47 U.S.C. § 254(e); 47 C.F.R. §§ 54.313, 54.314.

⁵⁹ See 47 C.F.R. § 54.307(d); see also Guam Cellular and Paging, Inc. Petition for Waiver of FCC Rule Section 54.314 of the Commission's Rules and Regulations, Order, 18 FCC Rcd 7138 (2003).

VII. Anti-Drug Abuse Certification.

Alltel certifies that no party to this petition is subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862. *See also* Exhibit A.

VIII. Conclusion.

Alltel respectfully request the Commission to designate it as an ETC on an expedited basis.

Respectfully submitted,

Alltel Communications, Inc.

Bv:

Olenn S. Rabin Vice President

Federal Communications Counsel

Alltel Corporation

601 Pennsylvania Avenue, N.W.

Suite 720

Washington, D.C. 20004

(202) 783-3970

Date: October 13, 2005

EXHIBIT A DECLARATION

AFFIDAVIT

- I, Glenn S. Rabin, do hereby declare under penalty of perjury as follows:
- 1. I am the authorized representative of Alltel Communications, Inc. ("Alltel" or the "Company") in charge of Alltel's Petition for Designation as an Eligible Telecommunications Carrier ("ETC") in the State of Georgia. This affidavit is submitted in support of that Petition.
- 2. Alltel is authorized to provide cellular radiotelephone service in the State of Georgia and is authorized to provide service in the requested ETC area described in its Application.
- 3. Alltel meets the criteria for ETC designation as explained herein.
- 4. Alltel is a "common carrier" for purposes of obtaining ETC designation pursuant to 47 U.S.C. § 214(e)(1). A "common carrier" is generally defined in 47 U.S.C. § 153(10) as a person engaged as a common carrier on a for-hire basis in interstate communications by wire or radio. Section 20.9(a)(7) of the Commission's Rules provides that cellular service is a common carrier service. See 47 C.F.R. § 20.9(a)(7).
- 5. Alltel currently offers and is able to provide the services and functionalities identified in 47 C.F.R. § 54.101(a). Each of these services and functionalities is discussed more fully below.
- a. <u>Voice-grade access to the public switched telephone network.</u> The FCC concluded that voice-grade access means the ability to make and receive phone calls, within a bandwidth of approximately 2700 Hertz frequency range. *See Federal-State Joint Board on Universal Service*, First Report and Order, 12 FCC Rcd 8776, 8810-11 (1997) ("*Universal Service Order*"). Alltel meets this requirement by providing voice-grade access to the public switched telephone network. Through its interconnection arrangements with local telephone companies, all customers of Alltel are able to make and receive calls on the public switched telephone network within the specified bandwidth.
- b. Local Usage. Beyond providing access to the public switched network, an ETC must include local usage as part of a universal service offering. Although the FCC had previously deferred a determination on the amount of local usage carriers would be required to provide as part of its universal service offering, it recently declined to adopt a specific local usage threshold. See Federal-State Joint Board on Universal Service, Report and Order, 20 FCC Rcd 6371, 6385 (2005). The FCC concluded that a competitive ETC should offer a local usage plan comparable to the one offered by the incumbent Local Exchange Carrier (LEC) in the service areas for which it seeks ETC designation. Alltel will meet such a requirement by offering rate plans that include a predetermined level of local usage within a substantially larger local calling area than the incumbent LEC. Alltel meets the FCC's local usage requirement by offering customers (a) local

usage plans which include a predetermined level of local usage; and (b) a universal service offering that provides a comparable value to the one offered by the incumbent LEC.

- Dual-tone, multi-frequency ("DTMF") signaling, or its functional equivalent. DTMF is a method of signaling that facilitates the transportation of call set-up and call detail information. Consistent with the principles of competitive and technological neutrality, the FCC permits carriers to provide signaling that is functionally equivalent to DTMF in satisfaction of this service requirement. 47 C.F.R. § 54.101(a)(3). Alltel currently uses out-of-band digital signaling and inband multi-frequency ("MF") signaling that is functionally equivalent to DTMF signaling. Alltel therefore meets the requirement to provide DTMF signaling or its functional equivalent.
- d. <u>Single-party service or its functional equivalent.</u> "Single-party service" means that only one party will be served by a subscriber loop or access line in contrast to a multi-party line. *Universal Service Order* at 8810. The FCC concluded that a wireless provider offers the equivalent of single-party service when it offers a dedicated message path for the length of a user's particular transmission. *Universal Service Order* at 8810. Alltel meets the requirement of single-party service by providing a dedicated message path for the length of all customer calls.
- e. Access to emergency services. The ability to reach a public emergency service provider by dialing 911 is a required service in any universal service offering. Phase I E-911, which includes the capability of providing both automatic numbering information ("ANI") and automatic location information ("ALI"), is only required if a public emergency service provider makes arrangements with the local provider for the delivery of such information. Alltel currently provides all of its customers with access to emergency service by dialing 911 in satisfaction of the basic 911 requirement, and either provides, or will provide subscribers with Phase I and Phase II E-911 services in accordance with the deployment schedules agreed to by Alltel and the local emergency service provider.
- f. Access to operator services. Access to operator services is defined as any automatic or live assistance provided to a consumer to arrange for the billing or completion, or both, of a telephone call. *Universal Service* Order at 8817-18. Alltel meets this requirement by providing all of its customers with access to operator services provided by either the Company or other entities (e.g., LECs, IXCs, etc.).
- g. Access to interexchange services. A universal service provider must offer consumers access to interexchange service to make and receive toll or interexchange calls. Equal access, however, is not required. "The FCC do[es] not include equal access to interexchange service among the services supported by universal service mechanisms." Universal Service Order at 8819. Alltel presently meets this requirement by providing all of its customers with the ability to make and receive interexchange or toll calls through direct interconnection arrangements the Company has with IXCs.

- h. Access to directory assistance. The ability to place a call to directory assistance is a required service offering. *Universal Service Order* at 8821. Alltel meets this requirement by providing all of its customers with access to directory assistance by dialing "411" or "XXX-555-1212".
- Toll limitation for qualifying low-income consumers. An ETC must offer either "toll control" or "toll blocking" services to qualifying Lifeline customers at no charge. The FCC no longer requires an ETC to provide both services as part of the toll limitation service required under 47 C.F.R. § 54.101(a)(9). See Universal Service Fourth Order on Reconsideration, 13 FCC Rcd 5318 (1997). In particular, all ETCs must provide toll blocking, which allows customers to block the completion of outgoing toll calls. Universal Service Order at 8821-22. Alltel currently has no Lifeline customers because only carriers designated as an ETC can participate in Lifeline. See 47 C.F.R. §§ 54.400-415. Once designated as an ETC, Alltel will participate in Lifeline as required, and will provide toll blocking capability in satisfaction of the FCC's requirement. Alltel currently has the technology to provide toll blocking and will use this technology to provide the service to its Lifeline customers, at no charge, as part of its universal service offerings.
- 6. <u>ANTI-DRUG ABUSE CERTIFICATION</u>. To the best of my knowledge, no party to the Application, nor any of their officers, directors, or persons holding 5% or more of the outstanding stock or shares (voting and/or non-voting) as specified in 1.2002(b) of the Commission's rules, are subject to a denial of federal benefits, including Commission benefits, pursuant to Section 5301 of the Anti-Drug Abuse of 1988, 21 V.S.C. § 862.

7. I declare under penalty of perjury that the foregoing is true and correct. Executed on October 13, 2005.

Alltel Communications, Inc.

Glenn S. Rabin Vice President

Federal Communications Counsel

Authorized Representative

Alltel Corporation 601 Pennsylvania Avenue, N.W. Suite 720 Washington, D.C. 20004 (202) 783-3970

Subscribed and sworn to before me This /2 day of October, 2005.

Notary Public

PERVENIA BROWN

Notary Public of District of Columbia
My Commission Expires July 14, 2006

EXHIBIT B

STATEMENT FROM GEORGIA PUBLIC SERVICE COMMISSION THAT IT LACKS JURISDICTION OVER CMRS APPLICATIONS

COMMISSIONERS:

Robert B. Baker, Jr., Chairman Dayld L. Burgésia H. Doug Everett Angela E. Speir Stan Wise DEPORAH K. FLANHAGAN EXECUTIVE DIRECTOR

REECE MEALISTER EXECUTIVE SECRETARY

Ceorgia Public Service Commission

(404) 656-4501 (808) 282-5813 244 WASHINGTON STREET, S.W. ATLANTA, GEORGIA 30334-8701

FAX: (464) 858-2341 Whitehelmistelija.iia

July 2, 2003

To Whom It May Concern:

In response to a letter filed on April 30, 2003, by ALLTEL Communications, Inc., Georgia RSA #12 Partnership and Georgia RSA #8 Partnership, the Georgia Public Service Commission hereby affirmatively states that the State of Georgia does not exercise jurisdiction over Commercial Mobile Radio Service providers for purposes of making determinations concerning eligibility for Eligible Telecommunications Carrier designations under 47 U.S.C. Section 214(e) and 47 C.F.R. Section 54.201 et seq.

In particular, the Georgia Public Service Commission affirms that ALLTEL Communications, Inc., Georgia RSA #12 Partnership and Georgia RSA #8 Partnership is not subject to jurisdiction of the State of Georgia for purposes of the foregoing determination.

-Sincerely,

Robert B. Baker, Jr., Chairman Georgia Public Service Commission

co: David L. Burgess, Commissioner, GPSC
H. Doug Sverett, Commissioner, GPSC
Angela B. Speir, Commissioner, GPSC
Stan Wise, Commissioner, GPSC
Tom Bond, Director Utilities Division, GPSC
Leon Bowles, Director Telecommunications, GPSC

Kristy Holley, CUC

Richard B. Moreland Government Affairs ALLTEL Communications 13560 Morris Road One ALLTEL Center Alpharetta, GA 30004

EXHIBIT C

DESCRIPTION OF ALLTEL'S CURRENT RATE PLANS IN THE STATE OF GEORGIA

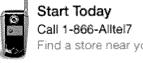
Total Freedom®

Select a Plan





The Total Freedom wireless plan from Alltel features our largest coverage area and eliminates long-distance and roaming fees in all 50 states. When you connect with Total Freedom, you're free to call from anywhere to anywhere across the entire U.S.





Sign up today and receive

- · Our largest coverage area
- Free nationwide long distance
- Free nationwide roaming

Plan features include

- Basic Voice Mail
- Caller ID
- 3-Way Calling
- No Answer Transfer
- Call Forwarding
- Call Waiting

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 Pay-Per-Use Messaging (8¢ Outgoing or Incoming)

Total Freedom Plans	\$39.99	\$49.99	\$59.99	\$79.99	\$99.99	\$149.99	\$199.99	\$299.99
Included Anytime Minutes	200	350	500	650	900	1500	2000	3000
Night and Weekend Home Minutes*	1000	1000	1000	1000	1000	1000	1000	1000
Mobile-to-Mobile Home Minutes**	1000	1000	1000	1000	1000	1000	1000	1000
Add'l Minute Rate	40¢	40¢	40¢	35¢	25¢	25¢	25¢	20¢

A \$20 non-refundable activation fee will apply.

*Night minutes are Mon. — Thurs. 9 p.m. — 5:59 a.m. Weekend minutes are Fri. 9 p.m. — Mon 5:59 a.m. Night and Weekend minutes available in the Total Freedom coverage area. Minutes must be used each month and do not carry over.

**Mobile-to-Mobile minutes apply to calls made to and from Alltel wireless customers that originate and terminate within the Total Freedom coverage area. Call forwarding, 411 and Voice Mail calls excluded.

One-year and two-year service agreements available.

Please note: Some included features and add-ons may not be available in certain areas.

Explanation of Fees & Services | Service Agreement

Available Add-ons

Touch2TalkSM **\$5-15 per month**

Call Home Free

Share Your Minutes \$9.99 per month on sele

Enhanced Voice Mail \$5 per month

ProductGuardSM **\$4 per month**

Mr. Rescue® \$3 per month

Directory Plus \$1.25 per call plus airtim

Extended Night Minutes \$7 per month

> MORE

Add Lines for \$9.99

Share your minutes on up to 4 lines!

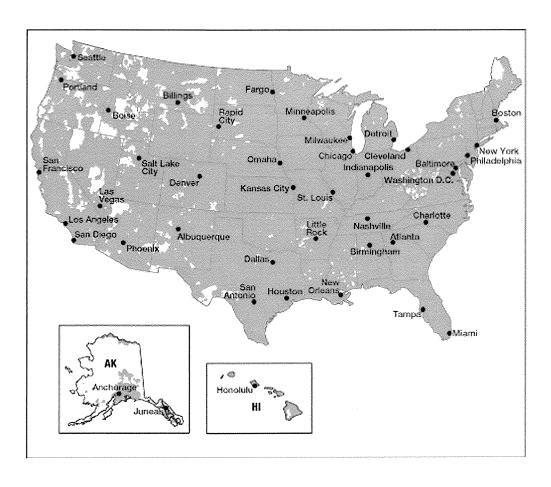
> MORE

Stay in touch worldwide

Call Internationally

> MORE





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Home | Personal | Wireless | Plans | National Freedom

National Freedom®

Select a Plan







National Freedom from Alltel offers extensive coverage at great rates. With this flexible plan, you're free to make calls to major U.S. cities and surrounding metropolitan areas in the Alltel national network — all without additional roaming or long-distance fees.

VIEW LARGER

- Sign up today and receive Extensive coverage including major U.S.
 - Free nationwide long distance
 - Free roaming near major cities

Plan features include

- Basic Voice Mail
- Caller ID 3-Way Calling
- No Answer Transfer
- Call Forwarding
- Call Waiting
- Pay-Per-Use Messaging (8¢ Outgoing or Incoming)

National Freedom Plans	\$39.99	\$49.99	\$79.99	\$99.99	\$149.99	\$199.99
Included Anytime Minutes	500	1000	1350	2000	3000	4000
Night and Weekend Minutes*	1000	unlimited	unlimited	unlimited	unlimited	unlimited
Mobile-to-Mobile Minutes**	1000	unlimited	unlimited	unlimited	unlimited	unlimited
Add'l Minute Rate	40¢	40¢	35¢	25¢	25¢	25¢

A \$20 non-refundable activation fee will apply. The Alltel National Freedom Network covers most U.S. cities. Coverage may not be available in all areas. National Freedom customers calling Puerto Rico coverage area may be subject to long-distance charges.

*Night minutes are Mon. - Thurs. 9 p.m. - 5:59 a.m. Weekend minutes are Fri. 9 p.m. - Mon 5:59 a.m. Minutes must be used each month and do not carry over.

**Mobile-to-Mobile minutes apply to calls made to and from Alltel wireless customers that originate and terminate within the National Freedom network coverage area. Call forwarding, 411 and Voice Mail calls excluded.

One-year and two-year service agreements available.

Please note: Some included features and add-ons may not be available in certain areas.

Explanation of Fees & Services | Service Agreement

Available Add-ons

Touch2TalkSM \$5-15 per month

FreeToRoam® Minutes \$10 per month

Call Home Free

Share Your Minutes \$9.99 per month on sele

Extended Night Minutes \$7 per month

> MORE

Special terms and condit apply.



Touch2Talk^{s™} Walkie-talkie servic across the Alltel network.

Get 2 Lines for \$75

Share 1000 nationwide minutes.

> MORE

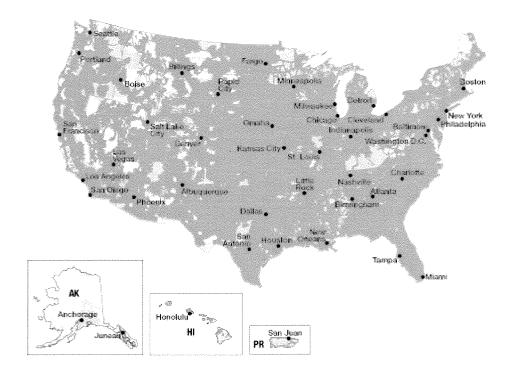
Stay in touch worldwide

Call Internationally

> MORE



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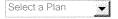


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Home | Personal | Wireless | Plans | Greater Freedom

Greater Freedom[™]







The Greater Freedom wireless plan from Alltel is the best value for those who keep calls local. You'll receive great coverage in your large local area and when you need to call outside your network, extended coverage is at your fingertips.

VIEW YOUR COVERAGE
Enter Zip Code > GO

Sign up today and receive

- Large local coverage area
- Best value for local callers
- Free nationwide long distance*

Plan* features include

- Basic Voice Mail
- Caller ID
- 3-Way Calling
- No Answer Transfer
- · Call Forwarding
- Call Waiting
- Pay-Per-Use Messaging (8¢ Outgoing or Incoming)

*Included on plans \$39.99 and higher.

Greater Freedom Plans	\$29.99	\$39.99	\$49.99	\$59.99	\$79.99	\$99.99	\$149.99	\$199.99
Included Anytime Minutes	300	1000	1000	1200	1600	2200	3200	4200
Night and Weekend Minutes**			unlimited	unlimited	unlimited	unlimited	unlimited	unlimited
Mobile-to-Mobile Minutes***		_	unlimited	unlimited	unlimited	unlimited	unlimited	unlimited
Add'l Minute Rate	45¢	40¢	40¢	40¢	35¢	25¢	25¢	25¢

Calls originating and terminating within the local coverage area use plan minutes and are toll free. On the \$29.99 plan, calls placed while in the local coverage area and terminating to anywhere outside the local coverage area will be charged 15¢ per minute long distance. Some areas may offer options for toll-free calling to the U.S. Customers utilizing one of these options may not pay long-distance charges, but will still continue to use rate plan minutes. Airtime charges may apply if rate plan minutes are unavailable. A \$20 non-refundable activation fee will apply.

Maps are general representation of coverage. Coverage varies based on system buildout, system availability and capacity, customer's equipment, terrain, signal strength, weather and other conditions.

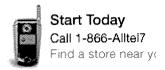
**Night minutes are Mon. — Thurs. 9 p.m. — 5:59 a.m. Weekend minutes are Fri. 9 p.m. — Mon. 5:59 a.m. Minutes must be used each month and do not carry over.

***Mobile-to-Mobile Minutes apply to calls between Alltel wireless customers that begin and end in your plan's calling area. Call forwarding, 411 and Voice Mail calls excluded.

One-year and two-year service agreements available.

Some included features and add-ons may not be available in certain areas.

Explanation of Fees & Services | Service Agreement



Available Add-ons*

Touch2TalkSM **\$5-15 per month**

FreeToRoam® Minutes \$10 per month

Call Home Free

Share Your Minutes \$9.99 per month on sele

Extended Night Minutes **\$7 per month**

Special terms and condit apply.

Learn more about availa ons, including add-ons fo under \$39.99. >MORE

Nationwide Long Distance



FREE – When you sign up today for \$49.99.

FreeToRoam® Minutes

Get 100 nationwide minutes each month.

> MORE



Stay in touch worldwide

Call Internationally

> MORE





Alitel Greater Freedom Coverage Area

Nationwide Roaming at 59¢ per minute, 40¢ per minute long distance while roaming

No Service Area

<u>CONFIDENTIAL – NOT FOR PUBLIC INSPECTION</u>

EXHIBIT D

ALLTEL'S FIVE-YEAR SERVICE IMPROVEMENT PLAN

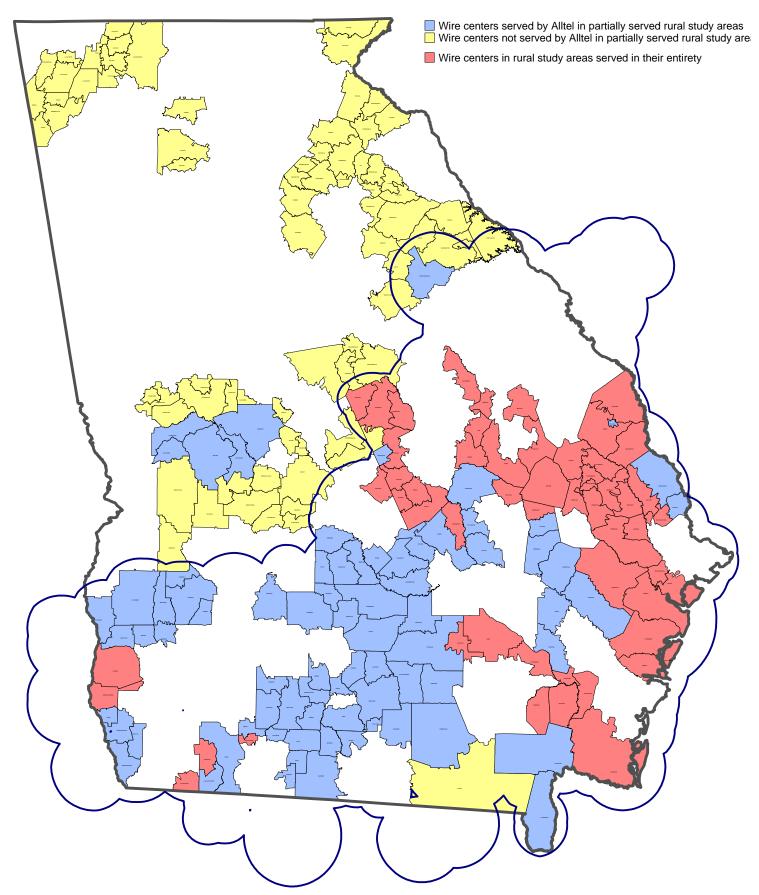
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EXHIBIT E

MAP ILLUSTRATING ALLTEL'S LICENSED (RURAL) AREA

EXHIBIT-E

Alltel Communications, Inc. State of Georgia



Source: Claritas Compass

EXHIBIT F

LIST OF WIRE CENTERS WITHIN RURAL AND NON-RURAL STUDY AREAS WHERE ALLTEL SEEKS DESIGNATION

Alltel Communications, Inc. State of Georgia Rural Study Areas Served in Their Entirety

LEC NAME	WIRE CENTER	CLLI CODE
ACCUCOMM TELECOMMUNICATIONS INC	GORDON	GRDNGAXA
ACCUCOMM TELECOMMUNICATIONS INC	IRWINTON	IRTNGAXA
ACCUCOMM TELECOMMUNICATIONS INC	TOOMSBORO	TMBOGAXA
ALMA TELEPHONE CO. INC.	ALMA	ALMAGAXA
ALMA TELEPHONE CO. INC.	NICHOLLS	NCHLGAXA
ALMA TELEPHONE CO. INC.	PATTERSON	PASNGAXA
BRANTLEY TELEPHONE CO. INC.	HOBOKEN	HOBKGAXA
BRANTLEY TELEPHONE CO. INC.	HORTENSE	HRTSGAXA
BRANTLEY TELEPHONE CO. INC.	NAHUNTA	NHNTGAXA
BRANTLEY TELEPHONE CO. INC.	WAYNESVILLE	WYVLGAXA
BULLOCH COUNTY RURAL TELEPHONE C	REGISTER	ARSNGAXA
BULLOCH COUNTY RURAL TELEPHONE C	BROOKLET	BRLTGAXA
BULLOCH COUNTY RURAL TELEPHONE C	STATESBORO	CLTOGAXA
BULLOCH COUNTY RURAL TELEPHONE C	PEMBROKE	NVLSGAXA
BULLOCH COUNTY RURAL TELEPHONE C	PORTAL	PRTLGAXA
BULLOCH COUNTY RURAL TELEPHONE C	BROOKLET	STSNGAXA
CAMDEN TELEPHONE & TELEGRAPH CO.	ST MARYS	STMYGAXA
COASTAL UTILITIES INC.	HINESVILLE	HNVLGAXA
COASTAL UTILITIES INC.	KELLER	KLLRGAXA
COASTAL UTILITIES INC.	MIDWAY	MDWYGAXA
COASTAL UTILITIES INC.	RICHMOND HILL	RMHLGAXA
DARIEN TELEPHONE CO. INC.	DARIEN	DARNGAXA
DARIEN TELEPHONE CO. INC.	TOWNSEND	EULNGAXA
DARIEN TELEPHONE CO. INC.	SAPELO ISLAND	SPISGAXA
FRONTIER COMMUNICATIONS OF GEORG	REGISTER	RGSTGAXA
FRONTIER COMMUNICATIONS OF GEORG	STATESBORO	STBOGAXA
FRONTIER COMMUNICATIONS OF GEORG	STATESBORO	STBOGAXB
IGEORGIA TELEPHONE CORP.	BLAKELY	BLKLGAXA
IGEORGIA TELEPHONE CORP.	CEDAR SPRINGS	CDSPGAXA
GEORGIA TELEPHONE CORP.	OCHLOCKNEE	OCHLGAXA
IGEORGIA TELEPHONE CORP.	WHIGHAM	WHGHGAXA
GLENWOOD TELEPHONE CO.	GLENWOOD	GLWDGAXA
PEMBROKE TELEPHONE CO. INC.	ELLABELL	ELBLGAXA
PEMBROKE TELEPHONE CO. INC.	PEMBROKE	PMBRGAXA
PINELAND TELEPHONE COOPERATIVE	ADRIAN	ADRNGAXA
PINELAND TELEPHONE COOPERATIVE	BARTOW	BARTGAXA
PINELAND TELEPHONE COOPERATIVE	COBBTOWN	CBTWGAXA
PINELAND TELEPHONE COOPERATIVE	DAVISBORO	DVBOGAXA
PINELAND TELEPHONE COOPERATIVE	KITE	KITEGAXA
PINELAND TELEPHONE COOPERATIVE	LEXSY	LXSYGAXA
PINELAND TELEPHONE COOPERATIVE	MIDVILLE	MIVLGAXA
PINELAND TELEPHONE COOPERATIVE	METTER	MTTRGAXA
PINELAND TELEPHONE COOPERATIVE	OAK PARK	OKPKGAXA
PINELAND TELEPHONE COOPERATIVE	TWIN CITY	TWCYGAXA
PLANTERS RURAL TELEPHONE COOPERA	DOVER	DOVRGAXA
PLANTERS RURAL TELEPHONE COOPERA	GUYTON	GYTNGAXA
I PARTERO ROLL FEEL HOME OOO! FIN	10011011	1011101011

Alltel Communications, Inc. State of Georgia Rural Study Areas Served in Their Entirety

STUDY AREA	WIRE CENTER	CLLI CODE
PLANTERS RURAL TELEPHONE COOPERA	HILLTONIA	HLTNGAXA
PLANTERS RURAL TELEPHONE COOPERA	NEWINGTON	NWNTGAXA
PLANTERS RURAL TELEPHONE COOPERA	SOUTH GUYTON	STGYGAXA
PROGRESSIVE RURAL TELEPHONE COOP	RENTZ	CDGVGAXA
PROGRESSIVE RURAL TELEPHONE COOP	CADWELL	CDWLGAXA
PROGRESSIVE RURAL TELEPHONE COOP	CHESTER	CHESGAXA
PROGRESSIVE RURAL TELEPHONE COOP	DUDLEY	DDLYGAXA
PROGRESSIVE RURAL TELEPHONE COOP	DEXTER	DXTRGAXA
PROGRESSIVE RURAL TELEPHONE COOP	RENTZ	RNTZGAXA
QUINCY TELEPHONE CO.	ATTAPULGUS	ATPLGAXA

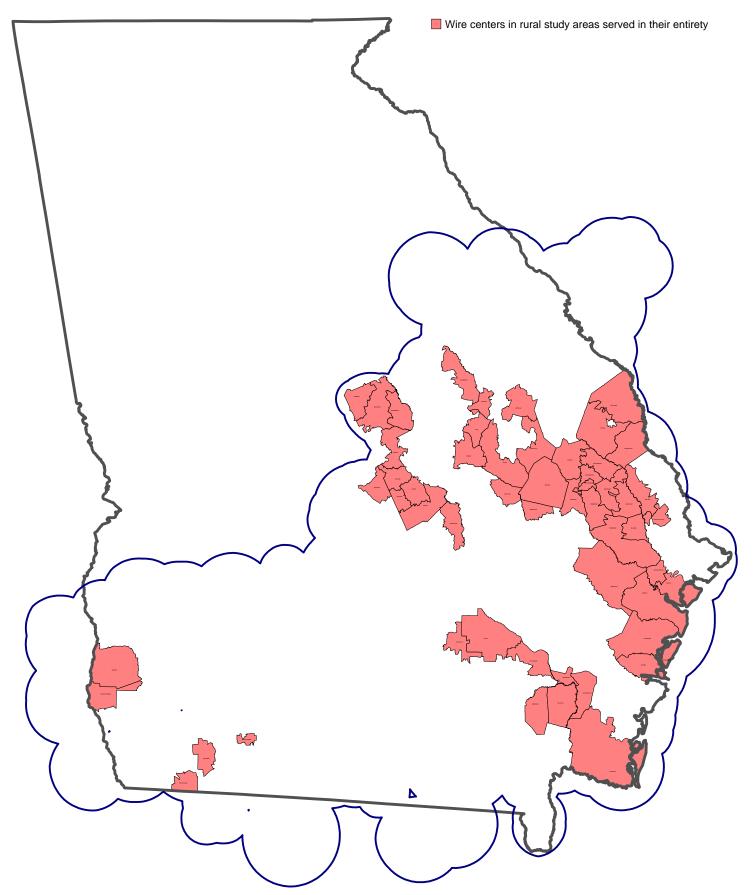
Alltel Communications, Inc. Non-Rural Wire Centers Where ETC Designation is Sought

STUDY AREA	WIRE CENTER	CLLI CODE	COUNTY
BELLSOUTH TELECOMM INC DBA SOUTH	JEKYLL IS	JKISGAMA	Glynn
BELLSOUTH TELECOMM INC DBA SOUTH	BRUNSWICK	BRWKGAMA	Glynn
BELLSOUTH TELECOMM INC DBA SOUTH	ST SIMONS IS	SSISGAES	Glynn
BELLSOUTH TELECOMM INC DBA SOUTH	JESUP	JESPGAES	Wayne

EXHIBIT F-1

MAP ILLUSTRATING WIRE CENTERS WITHIN RURAL STUDY AREAS THAT ARE SERVED BY ALLTEL IN THEIR ENTIRETY

Alltel Communications, Inc. State of Georgia



Source: Claritas Compass

EXHIBIT F-2

MAP ILLUSTRATING INCUMBENT LEC STUDY AREAS THAT ARE SERVED BY ALLTEL IN THEIR ENTIRETY

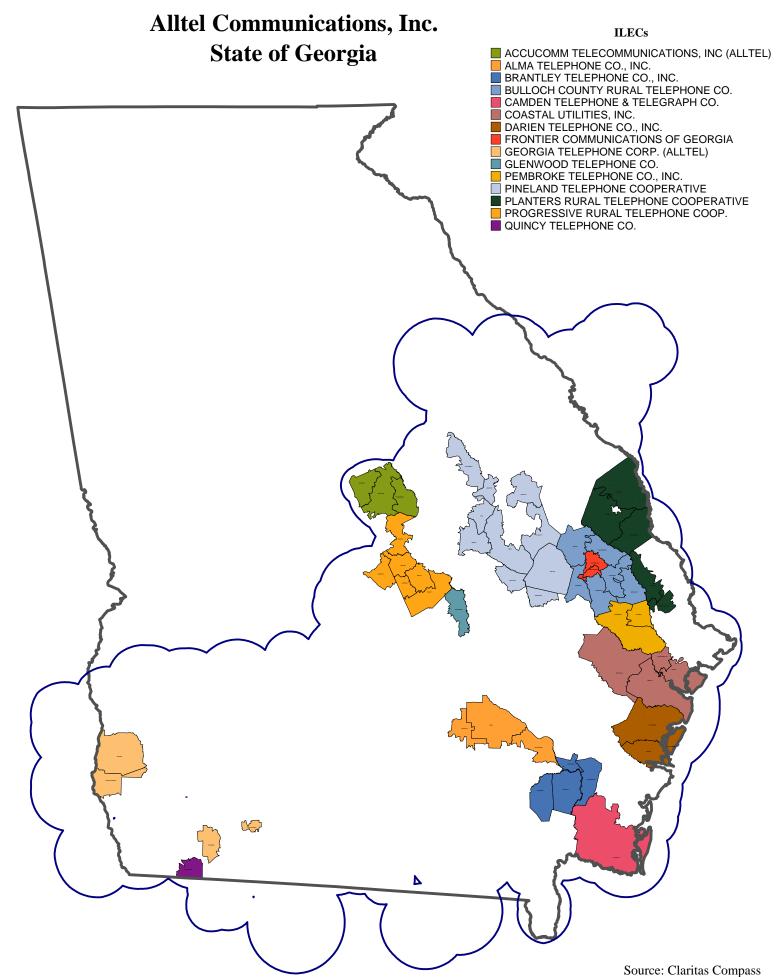


EXHIBIT F-3

MAP ILLUSTRATING NON-RURAL WIRE CENTERS THAT ARE SERVED BY ALLTEL IN THEIR ENTIRETY

Alltel Communications, Inc. State of Georgia

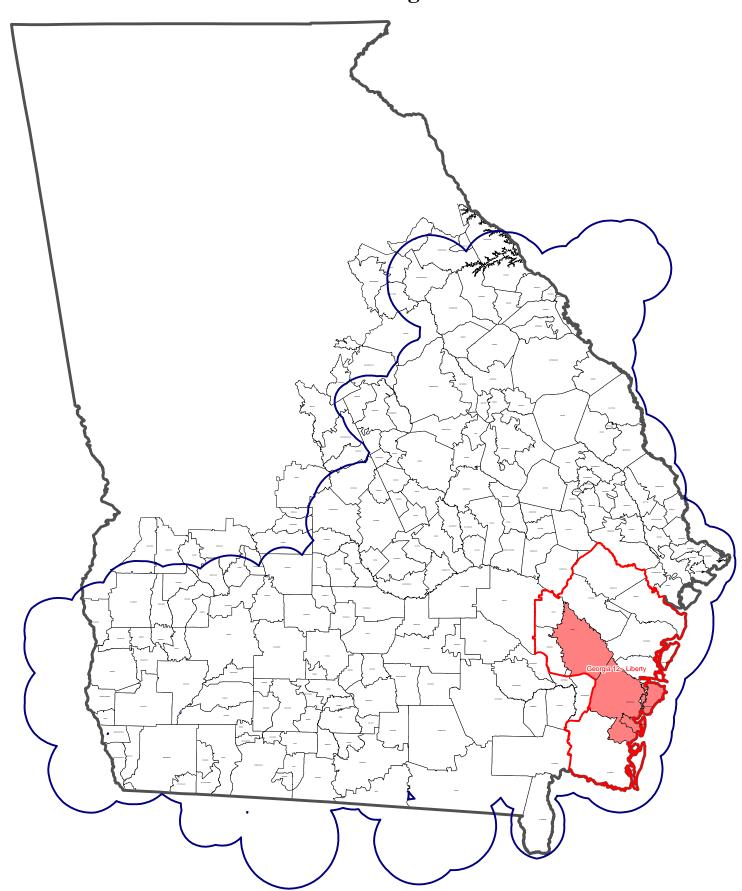


EXHIBIT G

LIST OF WIRE CENTERS WITHIN RURAL STUDY AREAS THAT ARE NOT SERVED IN THEIR ENTIRETY

LEC NAME	WIRE CENTER	CLLI CODE	SERVED
ALLTEL GEORGIA INC.	BRASELTON	BATNGAXA	NO
ALLTEL GEORGIA INC.	BYRON	BYRNGAXA	NO
ALLTEL GEORGIA INC.	COLBERT	CLBRGAXA	NO
ALLTEL GEORGIA INC.	COMMERCE	CMRCGAXA	NO
ALLTEL GEORGIA INC.	CENTERVILLE	CNVLGAXA	NO
ALLTEL GEORGIA INC.	COMER	COMRGAXA	NO
ALLTEL GEORGIA INC.	CARLTON	CRTOGAXA	NO
ALLTEL GEORGIA INC.	DANIELSVILLE	DEVLGAXA	NO
ALLTEL GEORGIA INC.	HOMER	HOMRGAXA	NO
ALLTEL GEORGIA INC.	ILA	ILA GAXA	NO
ALLTEL GEORGIA INC.	JEFFERSON	JFSNGAXA	NO
ALLTEL GEORGIA INC.	LEXINGTON	LXTNGAXA	NO
ALLTEL GEORGIA INC.	MAXEYS	MXYSGAXA	NO
ALLTEL GEORGIA INC.	MAYSVILLE	MYVLGAXA	NO
ALLTEL GEORGIA INC.	NICHOLSON	NCSNGAXA	NO
ALLTEL GEORGIA INC.	PENDERGRASS	PNDRGAXA	NO
ALLTEL GEORGIA INC.	UN PT	UNPNGAXA	NO
ALLTEL GEORGIA INC.	WHITE PLAINS	WHPLGAXA	NO
ALLTEL GEORGIA INC.	WINTERVILLE	WNVLGAXA	NO
ALLTEL GEORGIA INC.	CAIRO	CAIRGAXA	YES
ALLTEL GEORGIA INC.	CALVARY-RENO	CLREGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	BUENA VISTA	BNVSGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	BYROMVILLE	BYVLGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	СОНИТТА	CHTTGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	CHATSWORTH	CHWOGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	CANTON	CNTNGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	CANTON	CNTNGAXB	NO
ALLTEL GEORGIA COMMUNICATION COR	CARNESVILLE	CRNVGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	DALTON	DLTNGAXB	NO
ALLTEL GEORGIA COMMUNICATION COR	DALTON	DLTNGAXC	NO
ALLTEL GEORGIA COMMUNICATION COR	DALTON	DLTNGAXD	NO
ALLTEL GEORGIA COMMUNICATION COR	ELLAVILLE	ELVLGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	EASTANOLLEE	ENLLGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	IDEAL	IDELGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	JASPER	JSPRGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	LAVONIA	LAVNGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	LYERLY	LYRLGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	MILLEDGEVILLE	MDVLGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	MENLO	MENLGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	MANCHESTER	MNCHGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	MONROE	MONRGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	MARSHALLVILLE	MRVLGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	MONTEZUMA	MTZMGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	PERRY	PRRYGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	PRESTON	PSTNGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	SUMMERVILLE	SUVLGAXA	NO

LEC NAME	WIRE CENTER	CLLI CODE	SERVED
ALLTEL GEORGIA COMMUNICATION COR	TUNL HL	TNHLGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	TOCCOA	TOCCGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	TRION	TRINGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	UNADILLA	UNADGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	WOODLAND	WDLDGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	WINDER	WNDRGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	WARM SPGS	WRSPGAXA	NO
ALLTEL GEORGIA COMMUNICATION COR	ABBEVILLE	ABVLGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	ADEL	ADELGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	ALAPAHA	ALPHGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	ASHBURN	ASBNGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	PAVO	BAWKGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	BLUFFTON	BFTNGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	BERLIN	BRLNGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	BROXTON	BRXTGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	BOSTON	BSTNGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	COOLIDGE	CLDGGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	CUTHBERT	CTHBGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	DOUGLAS	DGLSGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	DOERUN	DORNGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	DAWSON	DWSNGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	EDISON	EDSNGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	ENIGMA	ENGMGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	FUNSTON	FNTNGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	FT GAINES	FTGNGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	FITZGERALD	FTZGGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	HAHIRA	HAHRGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	IRWINVILLE	IRVLGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	JACKSONVILLE	JCVLGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	LAKELAND	LKLDGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	MC RAE	MCRAGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	MEIGS	MEGSGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	MOULTRIE	MLTRGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	MORGAN	MRGNGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	MORVEN	MRVNGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	MT VERNON	MTVRGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	NORMAN PARK	NRPKGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	NASHVILLE	NSVLGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	OCILLA	OCLLGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	PAVO	PAVOGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	DAWSON	PRRTGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	QUITMAN	QTMNGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	RAY CITY	RYCYGAXB	YES
ALLTEL GEORGIA COMMUNICATION COR	SHELLMAN	SHMNGAXA	YES
ALLTEL GEORGIA COMMUNICATION COR	SASSER	SSSRGAXA	YES
GEORGIA ALLTEL TELECOMM INC.	CLAYTON	CYTNGAXA	NO

LEC NAME	WIRE CENTER	CLLI CODE	SERVED
GEORGIA ALLTEL TELECOMM INC.	DANVILLE	DAVLGAXA	NO
GEORGIA ALLTEL TELECOMM INC.	DILLARD	DLRDGAXA	NO
GEORGIA ALLTEL TELECOMM INC.	FARGO	FARGGAXA	NO
GEORGIA ALLTEL TELECOMM INC.	GRAY	GRAYGAXA	NO
GEORGIA ALLTEL TELECOMM INC.	HADDOCK	HDDCGAXA	NO
GEORGIA ALLTEL TELECOMM INC.	JEFFERSONVILLE	JFVLGAXA	NO
GEORGIA ALLTEL TELECOMM INC.	CHICKAMAUGA	KETNGAXA	NO
GEORGIA ALLTEL TELECOMM INC.	LA FAYETTE	LFYTGAXA	NO
GEORGIA ALLTEL TELECOMM INC.	MILLEDGEVILLE	LKSNGAXA	NO
GEORGIA ALLTEL TELECOMM INC.	LA FAYETTE	NOBLGAXA	NO
GEORGIA ALLTEL TELECOMM INC.	THOMASTON	THTNGAXA	NO
GEORGIA ALLTEL TELECOMM INC.	THOMASTON	THTNGAXB	NO
GEORGIA ALLTEL TELECOMM INC.	LA FAYETTE	VLNWGAXA	NO
GEORGIA ALLTEL TELECOMM INC.	YATESVILLE	YTVLGAXA	NO
GEORGIA ALLTEL TELECOMM INC.	ALAMO	ALAMGAXA	YES
GEORGIA ALLTEL TELECOMM INC.	COLLINS	CLNSGAXA	YES
GEORGIA ALLTEL TELECOMM INC.	DONALSONVILLE	DNVLGAXA	YES
GEORGIA ALLTEL TELECOMM INC.	FOLKSTON	FLTNGAXA	YES
GEORGIA ALLTEL TELECOMM INC.	GLENNVILLE	GLNVGAXA	YES
GEORGIA ALLTEL TELECOMM INC.	HOMERVILLE	HMVLGAXA	YES
GEORGIA ALLTEL TELECOMM INC.	IRON CITY	IRCYGAXA	YES
GEORGIA ALLTEL TELECOMM INC.	JAKIN	JAKNGAXA	YES
GEORGIA ALLTEL TELECOMM INC.	LUDOWICI	LDWCGAXA	YES
GEORGIA ALLTEL TELECOMM INC.	CHAUNCEY	MILNGAXA	YES
GEORGIA ALLTEL TELECOMM INC.	MONTROSE	MTRSGAXA	YES
GEORGIA ALLTEL TELECOMM INC.	ODUM	ODUMGAXA	YES
GEORGIA ALLTEL TELECOMM INC.	PITTS	PITSGAXA	YES
GEORGIA ALLTEL TELECOMM INC.	PINEVIEW	PNVWGAXA	YES
GEORGIA ALLTEL TELECOMM INC.	REBECCA	RBCCGAXA	YES
GEORGIA ALLTEL TELECOMM INC.	ROCHELLE	RCHEGAXA	YES
GEORGIA ALLTEL TELECOMM INC.	REIDSVILLE	RDVLGAXA	YES
GEORGIA ALLTEL TELECOMM INC.	RHINE	RHINGAXA	YES
GEORGIA ALLTEL TELECOMM INC.	RINCON	RNCNGAXA	YES
GEORGIA ALLTEL TELECOMM INC.	DONALSONVILLE	RYVLGAXA	YES
GEORGIA ALLTEL TELECOMM INC.	SCREVEN	SCRVGAXA	YES
GEORGIA ALLTEL TELECOMM INC.	SPRINGFIELD	SPFDGAXA	YES
GEORGIA ALLTEL TELECOMM INC.	ST GEORGE	STGRGAXA	YES
GEORGIA ALLTEL TELECOMM INC.	SYLVANIA	SYVNGAXA	YES
GEORGIA ALLTEL TELECOMM INC.	UVALDA	UVLDGAXA	YES
PLANT TELEPHONE CO.	PINEHURST	PNHRGAXA	NO
PLANT TELEPHONE CO.	LENOX	LENXGAXA	YES
PLANT TELEPHONE CO.	OMEGA	OMEGGAXA	YES
PLANT TELEPHONE CO.	PEARSON	PRSNGAXA	YES
PLANT TELEPHONE CO.	SOPERTON	SOTNGAXA	YES
PLANT TELEPHONE CO.	WILLACOOCHEE	WLCHGAXA	YES
PLANT TELEPHONE CO.	WARWICK	WRWKGAXA	YES

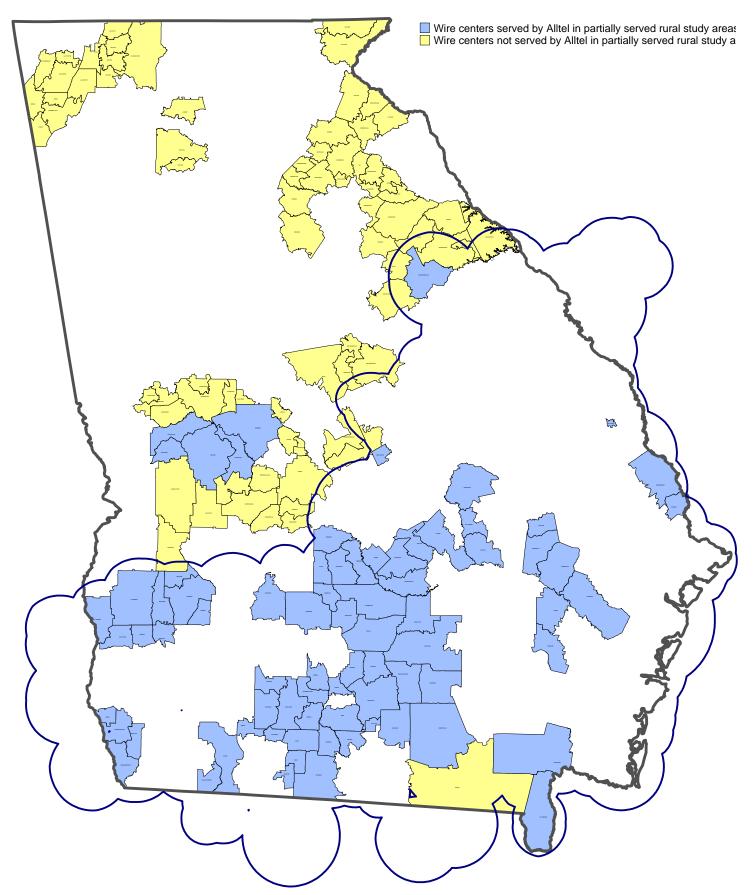
LEC NAME	WIRE CENTER	CLLI CODE	SERVED
PUBLIC SERVICE TELEPHONE CO.	CULLODEN	CUDNGAXA	NO
PUBLIC SERVICE TELEPHONE CO.	LIZELLA	LZLLGAXA	NO
PUBLIC SERVICE TELEPHONE CO.	BUTLER	BTLRGAXA	YES
PUBLIC SERVICE TELEPHONE CO.	BOX SPGS	GENVGAXA	YES
PUBLIC SERVICE TELEPHONE CO.	ROBERTA	RBRTGAXA	YES
PUBLIC SERVICE TELEPHONE CO.	REYNOLDS	RYNLGAXA	YES
PUBLIC SERVICE TELEPHONE CO.	TALBOTTON	TLTNGAXA	YES
WILKES TELEPHONE & ELECTRIC CO.	LINCOLNTON	LNTNGAXA	NO
WILKES TELEPHONE & ELECTRIC CO.	METASVILLE	MSVLGAXA	NO
WILKES TELEPHONE & ELECTRIC CO.	RAYLE	RAYLGAXA	NO
WILKES TELEPHONE & ELECTRIC CO.	TIGNALL	TGNLGAXA	NO
WILKES TELEPHONE & ELECTRIC CO.	WASHINGTON	WASHGAXA	NO
WILKES TELEPHONE & ELECTRIC CO.	CRAWFORDVILLE	CFVLGAXA	YES

EXHIBIT G-1

MAP ILLUSTRATING WIRE CENTERS WITHIN RURAL STUDY AREAS THAT ARE NOT SERVED IN THEIR ENTIRETY

EXHIBIT-G1

Alltel Communications, Inc. State of Georgia



Source: Claritas Compass

EXHIBIT G-2

MAP ILLUSTRATING INCUMBENT LEC STUDY AREAS THAT ARE NOT SERVED IN THEIR ENTIRETY

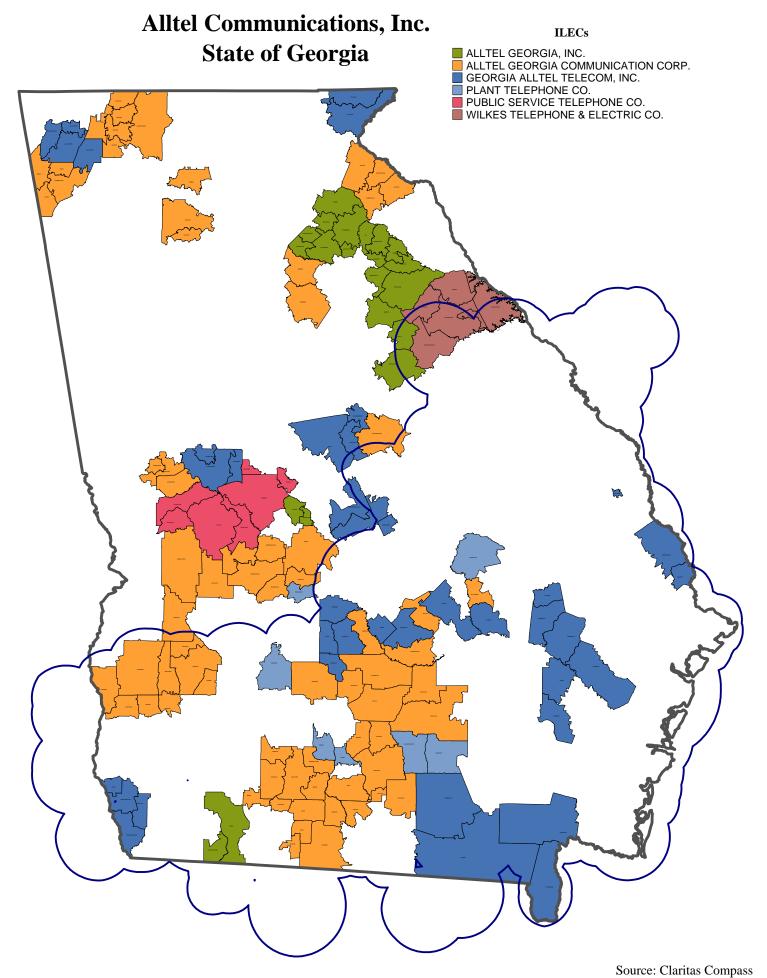


EXHIBIT H DENSITY ANALYSIS

Alltel Communications, Inc. Eligible Telecommunications Carrier Designation in the State of Georgia Density Analysis of Partially Served Rural Study Areas

ALLITEL GEORGIA INC.		CLLI CODE	ALLTEL	POPULATION CENTER MIZ	CENTER MI2	DENSI
	CAIRO	CAIRGAXA	YES	17,843	L.,	67.70
ALLTEL GEORGIA INC.	CALVARY-RENO	CLREGAXA	YES	1,802	73.143	24.64
WIRE CENTERS SERVED				19,645	336.711	58.34
ALLTEL GEORGIA INC.	BRASELTON	BATNGAXA	ON	9.370	51.97	180.30
GEORGIA	BYRON	BYRNGAXA	Q.	10,398		163.57
ALLTEL GEORGIA INC.	COLBERT	CLBRGAXA	9	4,283		155.90
ALLTEL GEORGIA INC.	COMMERCE	CMRCGAXA	9	14,470	130.948	110.50
ALLTEL GEORGIA INC.	CENTERVILLE	CNVLGAXA	Q.	24,545	28.484	861.71
ALLTEL GEORGIA INC.	COMER	COMRGAXA	Q.	3,226	55.645	57.97
ALLTEL GEORGIA INC.	CARLTON	CRTOGAXA	9	2,141	73.958	28.95
ALLTEL GEORGIA INC.	DANIELSVILLE	DEVLGAXA	9	5,929		77.19
	HOMER	HOMRGAXA	Q Q	7,607		58.29
ALLTEL GEÖRGIA INC.	ILA	ILA GAXA	9	4,160		92.26
ALLTEL GEORGIA INC.	JEFFERSON	JFSNGAXA	9	14,412	109.106	132.09
ALLTEL GEORGIA INC.	LEXINGTON	LXTNGAXA	9	6,387	234.37	27.25
ALLTEL GEORGIA INC.	MAXEYS	MXYSGAXA	Q.	941		10.93
	MAYSVILLE	MYVLGAXA	<u>Q</u>	4,565		95.49
ALLTEL GEORGIA INC.	NICHOLSON	NCSNGAXA	9	3,737	26.755	139.67
ALLTEL GEORGIA INC.	PENDERGRASS	PNDRGAXA	9	3,645	27.871	130.78
ALLTEL GEORGIA INC.	UN PT	UNPNGAXA	Q 2	3,692	80.132	46.07
ALLTEL GEORGIA INC.	WHITE PLAINS	WHPLGAXA	Q.	4,589	139.874	32.81
ALLTEL GEORGIA INC.	WINTERVILLE	WNVLGAXA	9	6.942		112.99
WIRE CENTERS NOT SERVED				135,039	4	90.15
ALI TEL GEORGIA COMMINICATION CORP	ARREVII I E	ABVI GAXA	у Ц >	3 552	108 364	32 78
ALTER GEODGIA COMAMINIONATION COM		\$ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \) U	10,05		77.10
ALTER GEODEIA COMMINICATION CORP	AUEL AI ABAHA	AUELGAXA AL DLOAVA	2 H2	10,033		16.11
ALL TEL GEORGIA COMMUNICATION CORP	ACAPAIA	ALTIGAXA	2 2	,000	`	16.40
ALL IEL GEONGIA COMINIONICATION CONT	NSUBCSIN	ASDINGASA O MANGO O MANGO	ָ מוֹנֵי מוֹנִי	6,0,0	`	40.70
ALLIEL GEORGIA COMMUNICATION CORP	PAVO	BAWKGAXA	Y ES	1,430	57.728	27.75
ALLIEL GEORGIA COMMUNICATION CORP	מסיין מות	Dr. INGAXA	S E	767		8.6
ALLIEL GEORGIA COMMUNICATION CORP	BERLIN	BRLNGAXA	YES	3,230		48.16
ALLIEL GEORGIA COMMUNICATION CORP	BROXION	BRXIGAXA	Y ES	4,400		30.19
ALLIEL GEORGIA COMMINICATION CORP	BOSI ON	BS I NGAXA	מון א	1,904		40.24
ALLIEL GEORGIA COMMUNICATION CORP	COOLIDGE	CLUGGAXA	S L	1,714		48.99
ALL TEL GEORGIA COMINIONICALION CORP	COLUMN AS	CHBGAXA	7 ES	5,670	338.887	16./3
ALLI TEI GEORGIA COMMINICATION CORP	DOCUELAS DOEBLIN	DOBNOAYA	א בו בו	2,034		79.30
ALL TEL GEORGIA COMMINICATION CORD	DAMESON	NACKONO.	2 2	2,430		20.79
ALL TEL GEORGIA COMMINICATION CORT	NOSMA	DWONGAXA CONCOROR	200	9,530		36.00
ALLIEL GEONGIA COMMINIONICATION CONT	FUSCIA	EDSINGANA	0 1	-,940		31.12
ALL IEL GEORGIA COMMUNICALION CORP	ENIGMA	ENGMGAXA	YES	2,736		31.60
ALLIEL GEORGIA COMMUNICALION CORP	FUNSTON	FNTNGAXA	YES	4,048		37.36
ALLIEL GEORGIA COMMUNICATION CORP	FT GAINES	FTGNGAXA	YES	2,643		22.40
ALLTEL GEORGIA COMMUNICATION CORP	FITZGERALD	FTZGGAXA	YES	17,503	~	68.19
ALLTEL GEORGIA COMMUNICATION CORP	HAHIRA	HAHRGAXA	YES	5,449		77.59
ALLTEL GEORGIA COMMUNICATION CORP	IRWINVILLE	IRVLGAXA	YES	1,879		20.70
ALLTEL GEORGIA COMMUNICATION CORP	JACKSONVILLE	JCVLGAXA	YES	1,095	129.238	8.47
ALLTEL GEORGIA COMMUNICATION CORP	LAKELAND	LKLDGAXA	YES	6,053	155.832	38.84
ALLTEL GEORGIA COMMUNICATION CORP	MC RAE	MCRAGAXA	YES	7,522	127.601	58.95

Alltel Communications, Inc.
Eligible Telecommunications Carrier Designation in the State of Georgia
Density Analysis of Partially Served Rural Study Areas

WIRE CENTER CLLI CODE 3 MEIGS MEIGS MEIGS MEIGS
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MT VERNON MTVRGAXA
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CHATSWORTH CHWOGAXA
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Alltel Communications, Inc. Eligible Telecommunications Carrier Designation in the State of Georgia Density Analysis of Partially Served Rural Study Areas

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STUDY AREA NAME	WIRE CENTER	CLLI CODE	SERVED BY ALLTEL	WIRE CENTER POPULATION	WIRE CENTER AREA OF WIRE POPULATION CENTER MIZ	DENSITY
	ONV	AL AMGAYA	о Ц	4 037	171.541	23.53
GEORGIA ALLIEL IELECOMMINO.	NAC TOO	CINSGAXA	YES	2,340		32.95
	DONALSONVILLE	DNVLGAXA	YES	5,402	•	51.62
	FOLKSTON	FLTNGAXA	YES	8,425	`	17.34
	GLENNVILLE	GLNVGAXA	YES	9,840		47.29
GEORGIA ALLTEL TELECOMM INC.	HOMERVILLE	HMVLGAXA	YES	6,444	<u>4</u>	13.26
GEORGIA ALLTEL TELECOMM INC.	IRON CITY	IRCYGAXA	YES	1,391		28.84
GEORGIA ALLTEL TELECOMM INC.	JAKIN	JAKNGAXA	YES	806		20.57
	LUDOWICI	LDWCGAXA	YES	6,550		26.44
GEORGIA ALLTEL TELECOMM INC.	CHAUNCEY	MILNGAXA	YES	2,495		15.00
	MONTROSE	MTRSGAXA	YES	406		14.30
GEORGIA ALLTEL TELECOMM INC.	MODO	ODUMGAXA	YES	3,564		24.66
	PITTS	PITSGAXA	YES	1,214		15.51
	PINEVIEW	PNVWGAXA	YES	1,514	_	14.58
	REBECCA	RBCCGAXA	YES	713		11.44
	ROCHELLE	RCHEGAXA	YES	2,567		20.66
	REIDSVILLE	RDVLGAXA	YES	8,737	-	61.40
	RHINE	RHINGAXA	YES	992		14.65
	RINCON	RNCNGAXA	YES	13,292		216.41
	DONALSONVILLE	RYVLGAXA	YES	2,869		26.80
	SCREVEN	SCRVGAXA	YES	2,840	153.661	18.48
	SPRINGFIELD	SPFDGAXA	YES	13,162	260.431	50.54
	ST GEORGE	STGRGAXA	YES	2,271	294.982	7.70
	SYLVANIA	SYVNGAXA	YES	3,153	12.272	
	IIVAI DA	UVLDGAXA	YES	3,643	134.536	27.08
				108,769	3809.603	28.55
		0.00	9	40.606	200 202	44.07
	CLAYTON	CYINGAXA	2 9	070,01		41.97
-	DANVILLE	DAVLGAXA	9	3,071		
	DILLARD	DLRDGAXA	2	4,359		.,
	FARGO	FARGGAXA	0	711		
	GRAY	GRAYGAXA	0	11,865		
	HADDOCK	HDDCGAXA	2	2,793		
	JEFFERSONVILLE	JFVLGAXA	<u>Q</u>	3,745		
	CHICKAMAUGA	KETNGAXA	9	2,487		
_	LA FAYETTE	LFYTGAXA	9	15,128	_	
GEORGIA ALLTEL TELECOMM INC.	MILLEDGEVILLE	LKSNGAXA	2	3,853		
GEORGIA ALLTEL TELECOMM INC.	LA FAYETTE	NOBL GAXA	9	4,271		
GEORGIA ALLTEL TELECOMM INC.	THOMASTON	THTNGAXA	9	19,132	2	
	THOMASTON	THTNGAXB	Q Q	7,067		_
GEORGIA ALLTEL TELECOMM INC.	LA FAYETTE	VLNWGAXA	9	2,584	<u> </u>	
GEORGIA ALLTEL TELECOMM INC.	YATESVILLE	YTVLGAXA	<u>Q</u>	1,498		
WIRE CENTERS NOT SERVED				93,190	2042.567	45.62
PLANT TELEPHONE CO.	LENOX	LENXGAXA	YES	1,750	41.65	
PLANT TELEPHONE CO.	OMEGA	OMEGGAXA	YES	3,942		
PLANT TELEPHONE CO.	PEARSON	PRSNGAXA	YES	5,161		
PLANT TELEPHONE CO.	SOPERTON	SOTNGAXA	YES	7,191		
_	-	•				

Alltel Communications, Inc.
Eligible Telecommunications Carrier Designation in the State of Georgia
Density Analysis of Partially Served Rural Study Areas

	WILLACOOCHEE WARWICK	WLCHGAXA	VEC		100,00	
RIVED CO.			Sign	2,663	124.681	21.36
ERVED PHONE CO.		WKWKGAXA	S L	23,823	799.412	29.80
	PINEHURST	PNHRGAXA	O _N	901	55.63 55.63	16.20 16.20
		RTIRGAXA	XES SHX	6.359	319.744	19.89
THE PROPERTY OF THE PROPERTY O	SS		YES	1,634		17.31
			YES	10,243	ñ	33.61
			YES	3,375	132.4	25.49
PUBLIC SERVICE TELEPHONE CO. TALE WIRE CENTERS SERVED	ALBOTTON	TLTNGAXA	YES	2,199 23,810	129.826 981.105	16.94 24.27
				Ç	1	C C
	CULLODEN	CUDNGAXA	2 2	520	15.438	33.08
WIRE CENTERS NOT SERVED		רבררפטטט	2	6,172		111.04
WILKES TELEPHONE & ELECTRIC CO. CRA	CRAWFORDVILLE	CFVLGAXA	YES	1,898	•	10.12
WIRE CENTERS SERVED			,	1,898	187.478	10.12
WILKES TELEPHONE & ELECTRIC CO.	INCOLNTON	LNTNGAXA	O _N	8,502	211.094	40.28
		MSVLGAXA	9	530		11.91
		RAYLGAXA	Q.	1,409	111.814	12.60
	LIGNALL	TGNLGAXA	9	1,748	120.028	14.56
	WASHINGTON	WASHGAXA	Q.	7,282	214.301	33.98
WIRE CENTERS NOT SERVED				19,471	701.745	27.75
AVERAGE DENSITY OF ALL WIRE CENTERS SERVED	VED			391,448	10916.29	35.86
AVERAGE DENSITY OF ALL UNSERVED WIRE CENTERS	NTERS			709,974	8262.71	85.93

EXHIBIT I HIGH-COST CERTIFICATION

Ms. Marlene Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Room TW-B204 Washington, DC 20037

Ms. Irene Flannery 2120 L Street, N.W. Suite 600 Washington, DC 20037

Re:

Alltel Communications, Inc.

High Cost Certification Docket No. 96-45

Dear Ms. Dortch and Ms. Flannery:

On behalf of Alltel Communications, Inc. and in connection with its application before the FCC for status as an eligible telecommunications carrier in the State of Georgia, we hereby forward the attached certification for high-cost support under the Universal Service program pursuant to Sections 54.313 and 54.314 of the Commission's rules.

Sincerely,

Glenn S. Rabin Vice President

Federal Communications Counsel

Alltel Corporation

601 Pennsylvania Avenue, N.W.

Suite 720

Washington, D.C. 20004

(202) 783-3970

Ms. Marlene Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Room TW-B204 Washington, DC 20037

Ms. Irene Flannery 2120 L Street, N.W. Suite 600 Washington, DC 20037

Re: Alltel Communications, Inc. Certification or High Cost Loop Support

Dear Ms. Dortch and Ms. Flannery:

This certification is submitted on behalf of Alltel Communications, Inc. ("Alltel" or the "Company") in connection with its application before the FCC for status as an eligible telecommunications carrier in the State of Georgia and in accordance with Sections 54.313 and 54.314 of the Commission's rules. On behalf of Alltel, I hereby certify under penalty of perjury that all high-cost support provided to the Company will be used for the provision, maintenance, and upgrading of facilities and services for which the support is intended, pursuant to Section 254(e) of the Telecommunications Act of 1996.

Alltel Communications, Inc.

Glenn S. Rabin

Vice President

Federal Communications Counsel Authorized Representative

Alltel Corporation 601 Pennsylvania Avenue, N.W. Suite 720 Washington, D.C. 20004 (202) 783-3970

Date: October 13, 2005

Subscribed and sworn to before me This 12 day of October, 2005.

Notary Public

PERVISIA BROWN

Notary Public of District of Columbia
My Commission Projetts Indy 14, 2009